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HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20060005
Agency Interest No. 288

Mr. Kelly B. Scrio
Vice President/Plant Manager
Formosa Plastics Corporation Formosa Plastics Corp
PO Box 271
Baton Rouge, LA 708210271

RE: Part 70 Operating Permit, Formosa Plastics Corporation, Louisiana, Baton Rouge Plant -PVC Unit, Formosa Plastics Corporation LA, Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Serio:

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2013, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2008.

Permit No.: 1004-V1

Sincerely,

Cheryl Sonnier Nolan Ph.D.
Assistant Secretary
CSN:cet
c: EPA Region VI

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Formosa Plastics Corp LA
Agency Interest No.: 288
PVC Unit
Baton Rouge, East Baton Rouge Parish, Louisiana**

I. Background

Formosa Plastics Corp LA, (FPC-LA), is an existing synthetic organic chemical manufacturing industry (SOCMI) facility consisting of three units, a Vinyl Chloride/EDC (VCM) Unit, a Polyvinyl Chloride (PVC) Unit, and a Utilities Unit. A Caustic Chlorine Unit (CCN) as well as one of two Vinyl Chloride Monomer (VCM) Units have been permanently shutdown and are no longer in operation. The Baton Rouge site has been in operation over 40 years.

State Permit No. 0840-00002-03, issued on July 29, 1988, approved the construction of a new 1,050 TPD PVC unit. A PSD permit (PSD-LA-546) for PM₁₀ and vinyl chloride (VCM) was also issued for the same construction. State Permit No. 0840-00002-05 and PSD-LA-546 (M-1) issued November 12, 1990 allowed the PVC Unit to increase production from 1,050 TPD to 1,200 TPD.

State Permit No. 0840-00002-09 was issued on December 14, 1995 for production increases from 1,200 TPD to 1,440 TPD. The expansion included installation of a new 240 TPD PVC dryer and one 1000 ton storage silo. The new dryer (EIQ 213) was constructed but the silo (EIQ 214) was not constructed.

Previously, the site consisted of a Caustic Chlorine Unit, Ethylene Dichloride/Vinyl Chloride unit, a Polyvinyl Chloride unit (PVC), and a Utility Unit operated under Permit No. 0840-00002-10 and PSD-LA-560 (M-2) issued March 7, 1997, and PSD-LA-546 (M-1) issued November 17, 1990. On September 25, 1996, FPC submitted an initial Part 70 application for its entire facility which included five operating units: Polyvinyl Chloride (PVC), Utilities, Caustic Chlorine (CCN), Vinyl Chloride Monomer 1 (VCM 1), and Vinyl Chloride Monomer 2 (VCM 2). After discussions with LDEQ, FPC began submitting updates to the initial facility-wide application in August 2000 in order to obtain individual Part 70 permits for each operating unit. On August 21, 2000, FPC-LA requested separate Title V permits for each operating unit.

The Formosa PVC unit was issued an initial Title V permit (Permit Number 1004-V0) on October 24, 2001, and the unit currently operates under this permit. This is the renewal/modification of the Part 70 operating permit for the PVC Unit.

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II. Origin

The PVC Unit presently operates under Part 70 Permit Number 1004-V0. An application to modify the PVC Unit permit was submitted to LDEQ on November 15, 2003 and supplemented on December 3, 2004. On April 20, 2006 Formosa submitted a renewal/modification application for the PVC Unit that incorporates and replaces the previously submitted modification applications. Supplemental information was received May 30, 2007.

III. Description

The PVC Unit produces PVC using suspension polymerization. The plant currently produces more than six grades of suspension PVC and is able to manufacture up to three grades simultaneously. Polymerization occurs in batch reactors to convert the VCM charged in each batch to PVC in a water slurry. The unreacted VCM gas is recovered from the reactors for recycle. The PVC slurry is pumped to blowdown tanks, where additional unreacted VCM flashes overhead to be reclaimed by condensation. The blowdown tanks also serve as holding tanks for continuous feed of the slurry stripping columns.

Residual VCM is steam stripped from the PVC slurry in slurry stripping columns. Residual VCM is recovered from the equipment upstream of and including the slurry stripper. Condensed VCM is recycled to the process. Noncondensable gases are routed to the VCM Unit Incinerators (EIQ #231A, 231B, 231C in the VCM Unit permit).

The stripped PVC slurry is then pumped through heat exchangers to dryer feed holding tanks and centrifuges, where the slurry is dewatered and the PVC wet cake is produced. Water is pumped to the biotreatment plant (EIQ# 234 in VCM Unit Permit). PVC wet cake is dried in either cyclone or fluidized bed dryers. Air vented from the cyclone dryers is passed through a water scrubber and PVC resin is screened by sieves and pneumatically conveyed to storage silos for loading operations. Each silo vent is controlled with a bag or cartridge filter dust collector. Rail cars and trucks are used to deliver finished products to customers from the facility. Fugitive emissions from piping components and transfer equipment in the PVC Unit are included as part of the process.

In-process water from the PVC Unit is transported to a storage tank and is then steam stripped in the wastewater stripping columns. The stripped water is sent to the biotreatment plant to treat any remaining organic compounds. The emissions associated with wastewater from the PVC Unit are incorporated into Facility-wide Wastewater Emissions (EIQ# 234),

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which is included in the VCM Unit permit. The PVC Unit also maintains necessary utilities equipment to aid in process operations, such as cooling towers.

This is a renewal of Title V Permit Number 1004-V0. Additionally, Formosa proposes the following modifications:

- 1) The PVC Unit modernization project includes modification of the existing reactors and ancillary equipment and construction and installation of two reactors, a slurry stripping column, a dryer, two chillers, and ancillary equipment. The project also includes replacement of the existing PT-103 tank (Source ID T-103) with a larger tank, addition of several insignificant activity tanks, and equipment associated with an automatic catalyst charging system. As a result of the modernization, there will be an increase in the PTE emissions from several existing emission sources in the PVC Unit such as the QA lab (EIQ# 216), reactor opening emissions (EIQ# 179), and material handling fugitive emissions (EIQ# 258). There will also be a small increase in PTE emissions from the PVC Unit vent stream to the Incinerators (EIQ# 231A, 231B, 231C); this increase has been approved in the recent VCM Unit Title V Permit No. 0840-00002-V0.
- 2) Inclusion of modifications to the internal configuration of existing reactors and ancillary equipment to improve heat transfer during the exothermic polymerization reaction. As a result of the change, batch cycle time of the reactor is decreased.
- 3) Reconciliation of Methanol Emissions – In the November 2003 and December 2004 applications, FPC-LA requested removal of methanol emissions from the PVC Dryers (EIQ# 178A-F, 213) since methanol had been eliminated from the process. Although methanol is not used in the process in the manner previously documented, it has since been determined that there is a potential for a small percentage of methanol to be present in a reactor additive. The methanol emissions are accounted for in the PVC Unit Process Train (EIQ# 257).
- 4) Reconciliation of VOC emissions to include previously existing, but unquantified mineral spirits used with a catalyst in the PVC polymerization reaction; these emissions are accounted for in the PVC Unit Process Train (EIQ #257).
- 5) Deletion of the four proposed (never constructed) silos (Source ID 214, 226, 227, and 228) previously approved in earlier permitting activities.
- 6) Reconciliation of the emission calculations for existing sources to incorporate the most current calculation methodology, factors, and speciation.
- 7) Updates to the language in the regulatory applicability tables,
- 8) Updates to the Insignificant Activities (LAC 33:III.501.B.5.A),
- 9) Incorporation of General Condition XVII (GC XVII) Activities.
- 10) FPC-LA requests the removal of the annual stack testing requirement from the permit. Permit 1004-V0 Specific Condition No. 3 requires annual stack testing for

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particulate matter (PM_{10}) from the PVC Dryers (EIQ# 178A-F, 213), Loading and/or Storage Silos (EIQ#180-198). Previous stack test data demonstrates that emissions from the PVC Dryers, Loading and Storage Silos are within the permit limits. PVC Dryer emissions are controlled by cyclones (multicyclones)/and a wet scrubber. Loading and/or Storage Silos are controlled by baghouses. The PVC Dryers are also operated in accordance with Specific Condition No. 8 of Permit Number 1004-V0. Note: The condition(s) was deleted in this permitting action.

- 11) FPC-LA proposes that in addition to monitoring PVC resin in accordance with 40 CFR 61 Subpart F, FPC-LA will monitor/record the hours of operation of the dryers (EIQ# 178A-F, 206, 213 and 256) and will use the hours of operation to calculate PM_{10} emissions.
- 12) FPC-LA requests clarification of the Part 70 Permit No. 1004-V0 Specific Condition No. 8 concerning the continuous flow monitoring and recordkeeping requirements. FPC-LA proposes to incorporate the definition of continuous as defined in 40 CFR 63 Subpart H. This language has been incorporated as a federal enforceable monitoring condition for the scrubber(s) flow rate on the dryers as LAC 33.III.507.H requirement.
- 13) Reconciliation of particulate emissions from the cooling towers (EIQ# 224) due to use of the correct drift rate in the PM_{10} calculations.
- 14) Reconciliation of Material Handling Emissions (EIQ# 258)- The emissions calculations were updated to incorporate previously existing, unquantified fugitive particulate emissions created during the production process and product loading. In addition, there will be an increase in material handling emissions from the PVC modernization project from material handling during production processing and product loading.
- 15) Creation of a Process Group as the PVC Unit Process Train (EIQ# 257) to incorporate sources downstream of the PVC Unit Slurry Stripping columns for operational flexibility. The PVC Unit Process Train includes all sources emitting PM and VOC downstream of the PVC Unit Slurry Stripping Columns, excluding fugitive VOC emissions already included in EIQ#177. Several of the sources included in the PVC Unit Process Train were previously permitted as individual emission sources, such as the PVC Dryers (EIQ# 178A-F, 206, 213, and 256), Storage Silos (EIQ# 193-198), Loading Silos (EIQ# 180-192), Centrifuges and Slurry Tanks. By permitting these sources together as the PVC Unit Process Train, FPC-LA is able to more accurately reflect potential emissions during operation.
- 16) Incorporation of a PVC Unit Emissions CAP as the PVC CAP. The PVC Unit Emissions CAP includes the PVC Unit Process Train (EIQ#257), Reactor Opening Emissions (EIQ#179), PVC Unit Fugitive Emissions (EIQ#177), QA Lab Vents (EIQ#216), and Cooling Towers (EIQ #224). The total average pound per hour and

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annual ton per year PM and VOC emissions for these sources are permitted in the PVC CAP (Group 11). Maximum pound per hour emissions are permitted with each individual source. Additionally, FPC-LA proposed monitoring and recordkeeping requirements to comply with federal enforceable conditions of 40 CFR 61 Subpart F and/or LAC 33:III.507.H and streamlined requirements to comply with LA-Non HON MACT to meet LAC 33:III.5109.A requirements.

- 17) FPC-LA requests continued allowance for addition or removal of fugitive emission components as part of the LDAR program for fugitive VOC emissions (EIQ# 177).
- 18) Inclusion of VOC netting demonstration and emission credit for emission offsets per NNSR.
- 19) Inclusion of PSD requirements for PM₁₀ from PSD-LA-546 (M-2). |
- 20) FPC-LA proposes to remove the monitoring requirements of 40 CFR 63.104 for the PVC Unit Cooling Tower (Source ID 224) from the FPC Air Toxics Compliance Plan (ATCP). The ATCP was approved by the LDEQ on May 15, 1995. As detailed in the ATCP Section IV.5, FPC-LA proposed monitoring facility cooling towers, including the PVC Unit cooling tower, in accordance with the HON provisions of 40 CFR 63.104, Heat Exchange System Requirements. However, the PVC Unit is not a HON regulated unit. Therefore the monitoring requirements of 40 CFR 63.104 do not apply to the cooling tower located in this unit. The costs associated with collection, transportation, and analyses of the PVC Unit cooling tower water for analytical testing are a competitive disadvantage to the facility. Additionally, sampling results from year 2000 to present have confirmed HAP VOC concentrations near or below the detection limit of 1 part per billion (ppb) for all monitored HAPs. This condition was deleted.
- 21) Reconciliation of unquantified emissions from two previously existing PVC Slurry Tanks, T-508 (vinyl chloride emissions) and T-510 (vinyl chloride, ammonia and chlorine emissions). These tanks are included in the PVC Unit Process train (EIQ# 257).
- 22) Deletion of Slurry Tank T-225H. Permit No. 1004-V0 included approval to construct a new PVC Slurry Tank (EIQ# T-225H). This tank will not be constructed.

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Estimated emissions in tons per year for the PVC Plant are as follows:

Pollutant	Before	After	Change
PM ₁₀	118.19	132.03	+13.84
SO ₂	-	-	-
NO _x	-	-	-
CO	-	-	-
VOC *	121.36	72.77	-48.59

*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Vinyl Chloride Monomer	22.29	31.28	+8.99
Chloroform	-	0.73	+0.73
1,2-Dichloroethane (EDC)	-	0.33	+0.33
Methanol	97.79	31.06	-66.73
Total	120.08	63.40	-56.68

Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Ammonia	-	<0.001	+<0.001
Chlorine	<0.001	4.40	+4.40
Total	<0.001	4.40	+4.40

*Other VOC (TPY): 9.37

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IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, Prevention of Significant Deterioration (PSD)/Nonattainment New Source Review (NNSR), and National Emission Standards for Hazardous Air Pollutants (NESHAP). 40 CFR 64-Compliance Assurance Monitoring (CAM) does not apply to the PSEUs in the PVC Unit because the PSEUs are subject to a NESHAP regulation published after November 15, 1990 or the particulate filter devices are recovery devices that meet the definition of "inherent process equipment". New Source Performance Standards (NSPS) apply to the facility but do not apply to the PVC Unit.

A. PSD/NNSR

Due to the close timing of construction of the PVC Unit modernization project with the Utilities Unit project (approved in Title V Permit No. 2915-V0) and the Vinyl Chloride Monomer (VCM) Unit modification project (approved in Title V Permit No. 0840-00002-V0), the New Source Review (NSR) analyses was updated in May 2007, to include all three projects. The proposed modifications were reviewed in accordance with NSR requirements. The net emissions increases of sulfur dioxide (SO₂) and carbon monoxide (CO) will be below the PSD threshold, therefore, no further PSD review is required for these pollutants. Nitrogen oxides (NO_x) emissions from the proposed PVC Unit modernization project will be below the respective Nonattainment New Source Review (NNSR)/PSD thresholds; therefore, no further PSD review is required for NO_x. NNSR/PSD review was required for VOC and PM₁₀ emissions as demonstrated in the table below:

<u>Pollutant</u>	<u>Baseline Actual Emissions</u>	<u>Projected Actual Emissions (PTE)</u>	<u>Contemporaneous Changes</u>	<u>Net Emissions Increase</u>	<u>PSD de minimis</u>	<u>Review required?</u>
PM	58.86	86.08	9.29	36.53	25	Y
PM ₁₀	54.81	81.60	9.29	36.09	15	Y
SO ₂	0.06	0.57	-	0.51	40	N
NO _x	25.51	59.23	37.78	-4.06	40	N
CO	0.59	34.44	-	33.85	100	N
VOC	26.05	88.96	4.04	66.95	40 ¹	(NNSR) Y

¹Per LAC 33:III.509.I.3, PSD requirements do not apply to nonattainment pollutants; Nonattainment New Source Review (NNSR) is applicable.

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1. Nonattainment New Source Review (NNSR)

NSR review indicates that the net emissions increases of volatile organic compounds (VOC) will be above the NNSR threshold. FPC-LA used banked credits to "net out" of NNSR LAER review. VOC emission credits for emissions offsetting was required to "net out" and include VOC emission offsets achieved from removal of methanol in the PVC dryers due to a change in the method of operation in 2002, elimination of the marine/tank car loading project in 1995 with 3.07 credits remaining, and shutdown of VCM1 Unit in 2005. Full details on the sources included in the VOC NNSR netting demonstration are as provided in the May 30, 2007 update to the PVC Unit permit application.

2. Prevention of Significant Deterioration (PSD)

The net increase in PM/PM₁₀ emissions for the PVC Unit modernization project is greater than the PSD significance threshold for PM/PM₁₀ and required a PSD Determination. The PSD analyses includes a Best Available Control technology (BACT) analysis, an air quality analysis, and additional impacts analysis. Full details of the PSD Review are provided in PSD-LA-546 (M-2), and where specified, as incorporated in this permitting activity.

B. MACT

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. Maximum Achievable Control Technology is required for pollutants that exceed the minimum emission rate (MER) in Table 51.1 and 2. MACT determination for an affected source(s) is included as a specific requirement in this permitting activity.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit

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condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in The Advocate, Baton Rouge, on <date>, 2008; and in the <local paper>, <local town>, on <date>, 2008. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on XXX, X, 2008. The draft permit was also submitted to US EPA Region VI on XXX, X, 2008. All comments will be considered prior to the final permit decision.

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VII. Effects on Ambient Air

Dispersion Model(s) Used: AERMOD

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Air Quality Standard (NAAQS)
PM ₁₀	Annual 24	45.40 $\mu\text{g}/\text{m}^3$ 136.1 $\mu\text{g}/\text{m}^3$	50 $\mu\text{g}/\text{m}^3$ 150 $\mu\text{g}/\text{m}^3$
Vinyl Chloride**	Annual	8.66 $\mu\text{g}/\text{m}^3$	1.19 $\mu\text{g}/\text{m}^3$

**The modeling shows an exceedance of vinyl chloride outside the boundaries of FPC-LA; the exceedance occurs only on industrial property and does not impact non-industrial property.

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VIII. General Condition XVII Activities

Work Activity	Schedule***	PM ₁₀	Emission Rates - tons			
			SO ₂	NO _x	CO	VOC
TLV Calibration	Daily for three minutes				<0.001	
GC Calibration	Three /day for 16 minutes each				<0.001	
Equipment Preparation for operation and maintenance	Varies two/day-monthly				0.005	
Sampling Activities	Varies four/day-annually				0.01	
Turnaround Emissions from opening and cleaning equipment	Once/year				0.07	
Propylene Glycol Activities					0.07	
Filter Maintenance	Varies from daily to six/year				0.01	
Vessel Openings and Maintenance	Once/year per vessel				0.11	
Total					0.175	

***Schedule: The scheduled frequencies are estimates only and may fluctuate.

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IX. Insignificant Activities – Including Mixing and Charging Tanks

Equipment #	Description	Tank Volume (gal)	Insignificant Activity Category	Pollutant	Annual Emissions (tpy)
PV-101	Storage Tank PV-101	264	LAC 33:III.501.B.5.A.3	Total VOC	0.001
PT-104	Storage Tank PT-104	4,756	LAC 33:III.501.B.5.A.3	Total VOC Methanol	0.04 0.02
PT-107	Dissolving Tank PT-107	6,340	LAC 33:III.501.B.5.A.3	Total VOC	<0.001
PT-108	Storage Tank PT-108	2,536	LAC 33:III.501.B.5.A.3	Total VOC	<0.001
PT-109	Dissolving Tank PT-109	3,170	LAC 33:III.501.B.5.A.3	Total VOC Methanol	0.02 0.01
PT-110	Storage Tank PT-110	952	LAC 33:III.501.B.5.A.3	Total VOC Methanol	<0.001 <0.001
PT-113	Dissolving Tank PT-113	1,050	LAC 33:III.501.B.5.A.3	Total VOC	<0.001
PT-114	Storage Tank PT-114	317	LAC 33:III.501.B.5.A.3	Total VOC	<0.001
PT-115	Dissolving Tank PT-115	1,585	LAC 33:III.501.B.5.A.3	Total VOC	0.58
PT-116	Storage Tank PT-116	634	LAC 33:III.501.B.5.A.3	Total VOC	0.58
PT-126	Storage Tank PT-126	1,584	LAC 33:III.501.B.5.A.3	Total VOC	<0.001
PT-127	Storage Tank PT-127	2,640	LAC 33:III.501.B.5.D	Ammonia	0.21
PT-128	Storage Tank PT-128	2,640	LAC 33:III.501.B.5.A.3	Total VOC	<0.001
PT-129	Storage Tank PT-129	792	LAC 33:III.501.B.5.A.3	Total VOC	<0.001
PT-132	Storage Tank PT-132	5,283	LAC 33:III.501.B.5.A.3	Total VOC Propylene Glycol	<0.001 <0.001
PT-302	Storage Tank PT-302	7,925	LAC 33:III.501.B.5.A.3	Total VOC	<0.001
PV-306	Storage Tank PV-306	528	LAC 33:III.501.B.5.A.3	Total VOC	0.002
PV-309	Storage Tank PV-309	1,689	LAC 33:III.501.B.5.A.3	Total VOC	0.001
PT-401	Storage Tank PT-401	1,450	LAC 33:III.501.B.5.A.3	Ammonia	0.08
N/A	Diesel Storage Tank	300	LAC 33:III.501.B.5.A.3	Total VOC	0.01
N/A	Waste Oil Storage Tank	300	LAC 33:III.501.B.5.A.3	Total VOC	<0.001
PT-618	Chlorine-Contact Tank	1,140	LAC 33:III.501.B.5.D	Chlorine	0.05

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Formosa Plastics Corp LA

Baton Rouge, East Baton Rouge Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III Chapter																	
		5*	9	11	13	15	2103	2108	2111	2113	2115	2122	2147	2153	22	29*	51*	53	56
UNF3	PVC Unit	1	1				3							3	3	1	1	1	1
FUG1	177-PVC Plant Fugitive Emissions							1								1			
EQT11	178A-PVC Dryer A						1							3			1		
EQT12	178B-PVC Dryer B						1							3			1		
EQT13	178C-PVC Dryer C						1							3			1		
EQT14	178D-PVC Dryer D						1							3			1		
EQT15	178E-PVC Dryer E						1							3			1		
EQT16	178F-PVC Dryer F						1							3			1		
EQT17	179-PVC Reactor Opening Emissions													3		1			
EQT18	180>Loading Silo A																		
EQT19	181>Loading Silo B																		
EQT20	182>Loading Silo C																		
EQT21	183>Loading Silo D																		
EQT22	184>Loading Silo E																		

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ID No.:	Description	LAC 33:III.Chapter																		
		5*	9	11	13	15	2103	2108	2111	2113	2115	2122	2147	2153	22	29*	51*	53	56	59*
EQT23	185-Loading Silo F																			
EQT24	186-Loading Silo G																			
EQT25	187-Loading Silo H																			
EQT26	188-Loading Silo I																			
EQT27	189-Loading Silo J																			
EQT28	190-Loading Silo K																			
EQT29	191-Loading Silo L																			
EQT30	192-Loading Silo M																			
EQT31	193-Storage Silo A																			
EQT32	194-Storage Silo B																			
EQT33	195-Storage Silo C																			
EQT34	196-Storage Silo D																			
EQT35	197-Storage Silo E																			
EQT36	198-Storage Silo F																			
EQT37	206-Waste PVC Dryer																	1		
EQT38	213- PVC Dryer																		1	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**Formosa Plastics Corp Louisiana – PVC Unit**

Agency Interest No.: 288

Formosa Plastics Corp LA

Baton Rouge, East Baton Rouge Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																	
		5*	9	11	13	15	2103	2108	2111	2113	2115	2122	2147	2153	22	29*	51*	53	56
ARE2	216-QC Lab Vents																		
EQT40	224-PVC Unit Cooling Tower																		
EQT44	T-225A-Slurry Tank PT-501 A																		
EQT45	T-225B -Slurry Tank PT-501 B																		
EQT46	T-225C -Slurry Tank PT-501 C																		
EQT47	T-225D -Slurry Tank PT-501 D																		
EQT48	T-225E -Slurry Tank PT-501 E																		
EQT49	T-225F -Slurry Tank PT-501 F																		
EQT50	T-225G -Slurry Tank PT-501 G																		
EQT52	T-225I -Slurry Tank PT-514																		
EQT53	T-508-XDW Tank PT-508																		
EQT54	T-510-XDW Tank PT-510																		
EQT57	T-103-Mixing Tank (PT-103)																		
EQT139	256- PVC Dryer																		
FUG003	258-Material Handling Fugitives																		

* The regulations indicated above are State Only regulations except for LAC 33:III.501.C.6 Limitations that specifically state that the regulation is Federally Enforceable.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Formosa Plastics Corp Louisiana – PVC Unit
Agency Interest No.: 288
Formosa Plastics Corp LA
Baton Rouge, East Baton Rouge Parish, Louisiana

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Formosa Plastics Corp Louisiana – PVC Unit
Agency Interest No.: 288
Formosa Plastics Corp LA
Baton Rouge, East Baton Rouge Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR					
		A	K	Ka	Kb	NNN	VV	RRR	A	F	V	FF	A	F	G	H	J	Q	64	68	82				
UNF3	PVC Unit								1	1	3	1	3	3	3	3	1	2	1	1					
FUG1	177-PVC Plant Fugitive Emissions							3			1	1													
EQT11	178A-PVC Dryer A											1													
EQT12	178B- PVC Dryer B											1													
EQT13	178C- PVC Dryer C											1													
EQT14	178D- PVC Dryer D											1													
EQT15	178E- PVC Dryer E											1													
EQT16	178F- PVC Dryer F											1													
EQT17	179-PVC Reactor Opening Emissions								3		1														
EQT18	180-Loading Silo A											2													
EQT19	181-Loading Silo B											2													
EQT20	182-Loading Silo C											2													
EQT21	183-Loading Silo D											2													
EQT22	184-Loading Silo E											2													
EQT23	185-Loading Silo F											2													
EQT24	186-Loading Silo G											2													
EQT25	187-Loading Silo H											2													

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Formosa Plastics Corp Louisiana - PVC Unit

Agency Interest No.: 288

Formosa Plastics Corp LA

Baton Rouge, East Baton Rouge Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR					
		A	K	Ka	Kb	NNN	VV	RRR	A	F	V	FF	A	F	G	H	J	Q	64	68	82				
EQT26	188-Loading Silo I																								
EQT27	189-Loading Silo J																								
EQT28	190-Loading Silo K																								
EQT29	191-Loading Silo L																								
EQT30	192-Loading Silo M																								
EQT31	193-Storage Silo A																								
EQT32	194-Storage Silo B																								
EQT33	195-Storage Silo C																								
EQT34	196-Storage Silo D																								
EQT35	197-Storage Silo E																								
EQT36	198-Storage Silo F																								
EQT37	206-Waste PVC Dryer																								
EQT38	213-PVC Dryer																								
ARE2	216-QC Lab Vents																								
EQT40	224-PVC Unit Cooling Tower																								
EQT44	T-225A-Slurry Tank PT-501 A	3	3	3	3																				
EQT45	T-225B -Slurry Tank PT-501 B	3	3	3	3																				
EQT46	T-225C -Slurry Tank PT-501 C	3	3	3	3																				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Formosa Plastics Corp Louisiana – PVC Unit
Agency Interest No.: 288
Formosa Plastics Corp LA
Baton Rouge, East Baton Rouge Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR					
		A	K	Ka	Kb	NNN	VV	RRR	A	F	V	FF	A	F	G	H	J	Q	64	68	82				
EQT47	T-225D -Slurry Tank PT-501 D	3	3	3					1																
EQT48	T-225E -Slurry Tank PT-501 E	3	3	3					1																
EQT49	T-225F -Slurry Tank PT-501 F	3	3	3					1																
EQT50	T-225G -Slurry Tank PT-501 G	3	3	3					1																
EQT52	T-225I -Slurry Tank PT-514	3	3	3					1																
EQT53	T-508-XDW Tank PT-508	3	3	3					1																
EQT54	T-510-XDW Tank PT-510	3	3	3					1																
EQT57	T-103-Mixing Tank (PT-103)	3	3	3					1																
EQT139	256-PVC Dryer								1																
FUG003	258-Material Handling Fugitives																								

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Formosa Plastics Corp Louisiana - PVC Unit

Agency Interest No.: 288

Formosa Plastics Corp LA

Baton Rouge, East Baton Rouge Parish, Louisiana

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Formosa Plastics Corp LA
Baton Rouge, East Baton Rouge Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
UNF3 PVC Unit	National Emission Standard for Benzene Waste Operations [40 CFR 61 Subpart FF]	NO CONTROL REQUIRED. Facility handles less than 10 Mg/yr of benzene waste. Recordkeeping and reporting requirements apply.
	National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry [40 CFR 63 Subpart F]	DOES NOT APPLY. Polyvinyl Chloride is not a listed chemical on Table 1 in this Subpart.
	Compliance Assurance Monitoring (CAM) [40 CFR 64]	DOES NOT APPLY. the PSEU is subject to a NESHAP regulation published after November 15, 1990 or the particulate filter device is a recovery device that meets the definition of "inherent process equipment". [40 CFR 64.1 and 64.2(b)]
	Control of Emission of Organic Compounds, Subchapter M. Limiting Volatile Organic Compound Emissions From Industrial Wastewater [LAC 33:III.2153]	DOES NOT APPLY. VOC concentration <1000 ppm in wastewater stream.
	Control of Emissions of Organic Compounds-Marine Vapor Recovery [LAC 33:III.2108]	DOES NOT APPLY. Facility does not have any marine loading capability.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**Formosa Plastics Corp Louisiana – PVC Unit****Agency Interest No.: 288****Formosa Plastics Corp LA****Baton Rouge, East Baton Rouge Parish, Louisiana****XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source**

ID No:	Requirement	Notes
FUG1 PVC Plant Fugitive Emissions 177	National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry [40 CFR 63 Subpart F]	DOES NOT APPLY. Polyvinyl Chloride is not a listed chemical in Table 1 of Subpart F and therefore this Subpart is not applicable.
	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks [40 CFR 63-Subpart-H]	DOES NOT APPLY. Polyvinyl Chloride is not a listed chemical in Table 1 of Subpart F and therefore this Subpart is not applicable.
	Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry [40 CFR 60 Subpart VV]	DOES NOT APPLY. Polyvinyl Chloride is not a listed chemical in 40 CFR 60.489.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT17 PVC Reactor Opening Emissions 179	Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes [40 CFR 60 Subpart RRR]	DOES NOT APPLY. Reactor does not produce as product, co-product, by-product, or intermediate any of the chemicals listed in 40 CFR 60.707.
	Control of Emissions of Organic Compounds-Waste Gas Disposal [LAC 33:III.2115]	DOES NOT APPLY. This regulation does not apply to any waste gas stream that is required by another federal or state regulation to implement controls that reduce VOCs to a more stringent standard than would be required by this section.
	Control of Emissions of Organic Compounds-Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations [LAC 33:III.2147]	DOES NOT APPLY. Reactor does not produce as product, co-product, by-product, or intermediate any of the chemicals listed in Table 8.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No.	Requirement	Notes
EQT40 Cooling Tower 224	National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers [40 CFR 63 Subpart Q]	DOES NOT APPLY. No chromium based water treatment chemicals are used in the cooling tower.
EQT11-16, 38, 139 PVC Dryers 178A-F-213, 256	Control of Emissions of Organic Compounds-Waste Gas Disposal [LAC 33:III.2115]	DOES NOT APPLY. This regulation does not apply to any waste gas stream that is required by another federal or state regulation to implement controls that reduce VOCs to a more stringent standard than would be required by this section.
EQT37	Waste PVC Dryer 206	

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No.	Requirement	Notes
EQT57 PT-103 Tank	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110]	DOES NOT APPLY. Does not meet the definition of a petroleum liquid. [40 CFR 60.111]
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a]	DOES NOT APPLY. Does not meet the definition of a petroleum liquid. [40 CFR 60.111a]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. Storage vessel has a capacity <19,812 gallons (75 cubic meters).
	Control of Emission of Organic Compounds – Storage of VOC Compounds [LAC 33:III.2103]	DOES NOT APPLY. The maximum true vapor pressure is less than 1.5 psia. [LAC 33:III.2103.B]

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT44-54 Slurry Tanks PT-501 A-G, PT-514, XDW Tanks PT-508 and PT-510	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110]	DOES NOT APPLY. Does not meet the definition of a petroleum liquid. [40 CFR 60.111]
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids-for-Construction,-Reconstruction,-or-Modification-Commenced- after May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a]	DOES NOT APPLY. The maximum true vapor pressure is less than 3.5 Kilopascals (kPa), i.e., 0.5 psia. [40 CFR 60.111a]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. The maximum true vapor pressure is less than 1.5 psia. [LAC 33:III.2103]

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The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
 - 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];

40 CFR PART 70 GENERAL CONDITIONS

2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement.
[Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]

40 CFR PART 70 GENERAL CONDITIONS

- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]

- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]

- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]

- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]

- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
 - 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 - 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 - 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;

40 CFR PART 70 GENERAL CONDITIONS

- 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 - 5. changes in emissions would not qualify as a significant modification; and
 - 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
- 1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 - 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
 - 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]

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- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 - 1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 - 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 - 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 - 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 - 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 - 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]
- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

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- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated November 15, 2003 and revised April 20, 2006, along with supplemental information dated December 3, 2004 and May 30, 2007, as well as the PSD application dated July 17, 2007 and supplemented November 28, 2007, and January 14 and April 7, 2008.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.
- This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.

LOUISIANA AIR EMISSION PERMIT
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- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
- B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.

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- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
 - 1. Report by June 30 to cover January through March
 - 2. Report by September 30 to cover April through June
 - 3. Report by December 31 to cover July through September
 - 4. Report by March 31 to cover October through December
 - D. Each report submitted in accordance with this condition shall contain the following information:
 - 1. Description of noncomplying emission(s);
 - 2. Cause of noncompliance;
 - 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 - 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 - 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
 - E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and

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- D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.

- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.

- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.

- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
 - 1. Generally be less than 5 TPY
 - 2. Be less than the minimum emission rate (MER)
 - 3. Be scheduled daily, weekly, monthly, etc., or
 - 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to

LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS

suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

All ID: 288 Formosa Plastics Corp Louisiana - Baton Rouge Plant
Activity Number: PER20060005
Permit Number: 1004-V1
Air - Title V Regular Permit Major Mod

Also Known As:	ID	Name	User Group	Start Date
annual ADVF	0840-000002	Formosa Plastics Corp LA	Asbestos	01-01-1980
		Formosa Plastics Corp Louisiana - Baton Rouge Plant	CDS Number	08-05-2002
	72-0905077	Federal Tax ID	Federal Tax ID	11-20-1999
Comp Order	LAD041224932	Formosa Plastics Corp LA	Groundwater	03-01-2000
PCICA	LA0006149	Formosa Plastics Corp LA	Hazardous Waste Notification	08-01-1980
WP0714	70805FRMSPGULFS	GPRRA Baselines	Hazardous Waste Permitting	10-01-1997
		LPDES #	LPDES Permit #	05-22-2003
		LWDPS #	LWDPS Permit #	06-25-2003
		Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
GD-033-1210	38878	Formosa Plastics Corp LA	Solid Waste Facility No.	01-08-2002
	83205	Formosa Plastics Corp LA	TEMPO Merge	10-31-2000
		Formosa Plastics Corp	TEMPO Merge	10-31-2000
		TRI #	Toxic Release Inventory	07-13-2004
Physical Location:		N end of Gulf States Rd	Main FAX:	2253586008
		Baton Rouge, LA 70805	Main Phone:	2253583341
Mailing Address: PO Box 271 Baton Rouge, LA 708210271				
Location of Front Gate: 30° 30' 6" 2 hundredths latitude, 91° 11' 9" 0 hundredths longitude, Coordinate Method: Lat.Nlong. - DMS; Coordinate Datum: NAD83				
Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Kelly Serio	PO Box 271 Baton Rouge, LA 708210271	2253588567 (WP)	Responsible Official for
	Omer Wolff	PO Box 271 Baton Rouge, LA 708210271	OWOLFF@FLBR.FF	Air Permit Contact For
	Omer Wolff	PO Box 271 Baton Rouge, LA 708210271	2253563341 (WP)	Emission Inventory Contact for
	Omer Wolff	PO Box 271 Baton Rouge, LA 708210271	OWOLFF@FLBR.FF	Emission Inventory Contact for
	Omer Wolff	PO Box 271 Baton Rouge, LA 708210271	OWOLFF@FLBR.FF	TEDI Contact for
	Omer Wolff	PO Box 271 Baton Rouge, LA 708210271	OWOLFF@FLBR.FF	Haz. Waste Billing Party for
	Omer Wolff	PO Box 271 Baton Rouge, LA 708210271	2253563341 (WP)	Accident Prevention Billing Party for
	Omer Wolff	PO Box 271 Baton Rouge, LA 708210271	OWOLFF@FLBR.FF	Accident Prevention Billing Party for
	Omer Wolff	PO Box 271 Baton Rouge, LA 708210271	2253563341 (WP)	TEDI Contact for
	Omer Wolff	PO Box 271 Baton Rouge, LA 708210271	2253563341 (WP)	Air Permit Contact For
	Omer Wolff	PO Box 271 Baton Rouge, LA 708210271	2253563341 (WP)	Haz. Waste Billing Party for
Related Organizations:	Name	Address	Phone (Type)	Relationship

General Information

AI ID: 288 Formosa Plastics Corp Louisiana - Baton Rouge Plant
 Activity Number: PER20060005
 Permit Number: 1004-V1

Air - Title V Regular Permit Major Mod

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Formosa Plastics Corp	PO Box 271 Baton Rouge, LA 708210271		Operates
	Formosa Plastics Corp	PO Box 271 Baton Rouge, LA 708210271		Owns
	Formosa Plastics Corp	PO Box 271 Baton Rouge, LA 708210271		Emission Inventory Billing Party
	Formosa Plastics Corp	PO Box 271 Baton Rouge, LA 708210271		Air Billing Party for
	Formosa Plastics Corp	PO Box 271 Baton Rouge, LA 708210271		Water Billing Party for

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit.
 Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-0775 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
Activity Number: PER20060005
Permit Number: 1004-V1
Air - Title V Regular Permit Major Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
257-PVC Unit Process Train						
EQT 0011	178A - PVC Dyer A		45909 SCFM	45909 SCFM		8760 hr/yr
EQT 0012	178B - PVC Dyer B		45909 SCFM	45909 SCFM		8760 hr/yr
EQT 0013	178C - PVC Dyer C		45909 SCFM	45909 SCFM		8760 hr/yr
EQT 0014	178D - PVC Dyer D		45909 SCFM	45909 SCFM		8760 hr/yr
EQT 0015	178E - PVC Dyer E		53609 SCFM	53609 SCFM		8760 hr/yr
EQT 0016	178F - PVC Dyer F		28310 SCFM	28310 SCFM		8760 hr/yr
EQT 0018	180 - Loading Silo A		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0019	181 - Loading Silo B		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0020	182 - Loading Silo C		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0021	183 - Loading Silo D		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0022	184 - Loading Silo E		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0023	185 - Loading Silo F		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0024	186 - Loading Silo G		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0025	187 - Loading Silo H		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0026-	188 - Loading Silo I		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0027	189 - Loading Silo J		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0028	190 - Loading Silo K		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0029	191 - Loading Silo L		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0030	192 - Loading Silo M		5425 SCFM	5425 SCFM		8760 hr/yr
EQT 0031	193 - Storage Silo A		7325 SCFM	7325 SCFM		8760 hr/yr
EQT 0032	194 - Storage Silo B		7325 SCFM	7325 SCFM		8760 hr/yr
EQT 0033	195 - Storage Silo C		7325 SCFM	7325 SCFM		8760 hr/yr
EQT 0034	196 - Storage Silo D		7325 SCFM	7325 SCFM		8760 hr/yr
EQT 0035	197 - Storage Silo E		7325 SCFM	7325 SCFM		8760 hr/yr
EQT 0036	198 - Storage Silo F		7325 SCFM	7325 SCFM		8760 hr/yr
EQT 0037	206 - Waste PVC Dyer		176 SCFM	176 SCFM		8760 hr/yr
EQT 0038	213 - PVC Dyer		55500 SCFM	55500 SCFM		8760 hr/yr
EQT 0044	T-225A - Slurry Tank P-501 A	44514 gallons				8760 hr/yr
EQT 0045	T-225B - Slurry Tank P-501 B	44514 gallons				8760 hr/yr
EQT 0046	T-225C - Slurry Tank P-501 C	44514 gallons				8760 hr/yr
EQT 0047	T-225D - Slurry Tank P-501 D	44514 gallons				8760 hr/yr
EQT 0048	T-225E - Slurry Tank P-501 E	44514 gallons				8760 hr/yr
EQT 0049	T-225F - Slurry Tank P-501 F	44514 gallons				8760 hr/yr
EQT 0050	T-225G - Slurry Tank P-501 G	44514 gallons				8760 hr/yr
EQT 0052	T-225I - Slurry Tank P-514	110149 gallons				8760 hr/yr
EQT 0053	T-508 - XDW Tank PT-508	15537 gallons				8760 hr/yr
EQT 0054	T-510 - XDW Tank PT-510	13609 gallons				8760 hr/yr
EQT 0139	256 - PVC Dyer	45909 SCFM	45909 SCFM			8760 hr/yr
EQT 0141	FO - Filter Openings					8760 hr/yr

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AJ ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
 Activity Number: PER20060005
 Permit Number: 1004-V1
 Air - Title V Regular Permit Major Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
257-PVC Unit Process Train						
FUG 0003	258 - PVC Plant Material Handling Fugitive Emissions			Not applicable		8760 hr/yr 1
PVC Unit						
ARE 0002	216 - QA Lab Vents					8760 hr/yr 1
EOT 0017	1179 - PVC Reactor Opening Emissions					8760 hr/yr 1
EOT 0040	224 - Cooling Tower					8760 hr/yr 1
EOT 0057	1103 - PT-103 Tank	12700 gallons				8760 hr/yr 1
EQT 0071	PC-201 - Slurry Stripper A					8760 hr/yr 1
EQT 0072	PC-202 AB/C - Slurry Stripper AB/C					8760 hr/yr 1
EOT 0073	CS - Ceritifugues					8760 hr/yr 1
EOT 0074	WWT - Wastewater Tanks					8760 hr/yr 1
EOT 0075	250AB - Wastewater Strippers AB					8760 hr/yr 1
EOT 0076	VCMR - VCM Recovery					8760 hr/yr 1
FUG 0001	1177 - PVC Plant Fugitive Emissions			Not applicable		8760 hr/yr 1
Stack Information:						
ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)
257-PVC Unit Process Train						
EQT 0011	178A - PVC Dryer A	39	29600	4		120
EQT 0012	178B - PVC Dryer B	60	45300	4		120
EQT 0013	178C - PVC Dryer C	60	45300	4		120
EQT 0014	178D - PVC Dryer D	60	45300	4		120
EQT 0015	178E - PVC Dryer E	60	45300	4		120
EQT 0016	178F - PVC Dryer F	68	51186	4		120
EQT 0018	180 - Loading Silo A	36	3305	1.4		100
EQT 0019	181 - Loading Silo B	35.78	3305	1.4		100
EOT 0020	182 - Loading Silo C	35.78	3305	1.4		100
EOT 0021	183 - Loading Silo D	35.78	3305	1.4		100
EOT 0022	184 - Loading Silo E	35.78	3305	1.4		100
EOT 0023	185 - Loading Silo F	35.78	3305	1.4		100
EOT 0024	186 - Loading Silo G	35.78	3305	1.4		100
EOT 0025	187 - Loading Silo H	35.78	3305	1.4		100
EOT 0026	188 - Loading Silo I	35.78	3305	1.4		100
EOT 0027	189 - Loading Silo J	35.78	3305	1.4		100
EOT 0028	190 - Loading Silo K	35.78	3305	1.4		100

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Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
257-PVC Unit Process Train							
EQT 0028	191 - Loading Silo L	35.78	3305	1.4		100	113
EQT 0030	192 - Loading Silo M	35.78	3305	1.4		100	113
EQT 0031	193 - Storage Silo A	58	5400	1.4		100	113
EQT 0032	194 - Storage Silo B	58	5400	1.4		100	113
EQT 0033	195 - Storage Silo C	58	5400	1.4		100	113
EQT 0034	196 - Storage Silo D	58	5400	1.4		100	113
EQT 0035	197 - Storage Silo E	58	5400	1.4		100	113
EQT 0036	198 - Storage Silo F	22	2038	1.4		100	113
EQT 0037	206 - Waste PVC Dyer	15	176	.5		20	140
EQT 0038	213 - PVC Dyer	59	25000	3		115	126
EQT 0044	T-225A - Slurry Tank P-501 A			19		21	
EQT 0045	T-225B - Slurry Tank P-501 B			19		21	
EQT 0046	T-225C - Slurry Tank P-501 C			19		21	
EQT 0047	T-225D - Slurry Tank P-501 D			19		21	
EQT 0048	T-225E - Slurry Tank P-501 E			19		21	
EQT 0049	T-225F - Slurry Tank P-501 F			19		21	
EQT 0050	T-225G - Slurry Tank P-501 G			19		21	
EQT 0052	T-225I - Slurry Tank P-514			19		21	
EQT 0053	T-508 - XDW Tank PT-508			19		21	
EQT 0139	256 - PVC Dyer	59	25000	3		115	126
PVC Unit							
ARE 0002	216 - QA Lab Vents					40	
EQT 0040	224 - Cooling Tower		35		2524	40	108

Relationships:

ID	Description	Relationship	ID	Description
EQT 0017	PVC Reactor Opening Emissions	Controls emissions from Receiver	EQT 0057	PT-103 Tank
EQT 0074	Wastewater Tanks		EQT 0073	Centrifuges
EQT 0076	VCM Recovery	Controls emissions from	EQT 0071	Slurry Stripper A
EQT 0076	VCM Recovery	Controls emissions from	EQT 0072	Slurry Stripper A/B/C
EQT 0076	VCM Recovery	Controls emissions from	EQT 0075	Wastewater Strippers A/B
GRP 0018	231A-C Incinerator Emissions [Cap]	Controls emissions from	EQT 0076	VCM Recovery

INVENTORIES

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
 Activity Number: PER20060005
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 Air - Title V Regular Permit Major Mod

Subject Item Groups:

ID	Group Type	Description	Group Description
CRG 0007	Common Requirements Group	CRG7 - PVC Dryers	
CRG 0008	Common Requirements Group	CRG8 - PVC Loading and Storage Silos	
CRG 0009	Common Requirements Group	CRG9 - PVC Unit Slurry and XOW Tanks	
CRG 0011	Common Requirements Group	CRG11 - Strippers	
GRP 0011	Equipment Group	GRP11 - PVC Unit CAP	
GRP 0018	Equipment Group	GRP18 - 23TA-C Incinerator Emissions [Cap]	
PCS 0001	Process Group	PCS1 - 257-PVC Unit Process Train	
UNF 0003	Unit or Facility Wide	UNF3 - PVC Unit	

Group Membership:

ID	Description	Member of Groups
ARE 0002	216 - QA Lab Vents	GRP0000000011
CRG 0007	CRG7 - PVC Dryers	PCSD000000001
CRG 0008	CRG8 - PVC Loading and Storage Silos	PCSD000000001
CRG 0009	CRG9 - PVC Unit Slurry and XDW Tanks	PCSD000000001
EQT 0011	178A - PVC Dyer A	CRG0000000007, GRP0000000011, PCS0000000001
EQT 0012	178B - PVC Dyer B	CRG0000000007, GRP0000000011, PCS0000000001
EQT 0013	178C - PVC Dyer C	CRG0000000007, GRP0000000011, PCS0000000001
EQT 0014	178D - PVC Dyer D	CRG0000000007, GRP0000000011, PCS0000000001
EQT 0015	178E - PVC Dyer E	CRG0000000007, GRP0000000011, PCS0000000001
EQT 0016	178F - PVC Dyer F	CRG0000000007, GRP0000000011, PCS0000000001
EQT 0017	179 - PVC Reactor Opening Emissions	GRP0000000011
EQT 0018	180 - Loading Silo A	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0019	181 - Loading Silo B	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0020	182 - Loading Silo C	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0021	183 - Loading Silo D	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0022	184 - Loading Silo E	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0023	185 - Loading Silo F	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0024	186 - Loading Silo G	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0025	187 - Loading Silo H	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0026	188 - Loading Silo I	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0027	189 - Loading Silo J	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0028	190 - Loading Silo K	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0029	191 - Loading Silo L	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0030	192 - Loading Silo M	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0031	193 - Storage Silo A	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0032	194 - Storage Silo B	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0033	195 - Storage Silo C	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0034	196 - Storage Silo D	CRG0000000008, GRP0000000011, PCS0000000001

INVENTORIES

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
 Activity Number: PER20060005
 Permit Number: 1004-V1
 Air - Title V Regular Permit Major Mod

Group Membership:

ID	Description	Member of Groups
EQT 0035	197 - Storage Silo E	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0036	198 - Storage Silo F	CRG0000000008, GRP0000000011, PCS0000000001
EQT 0037	206 - Waste PVC Dyer	CRG0000000007, GRP0000000011, PCS0000000001
EQT 0038	213 - PVC Dyer	CRG0000000007, GRP0000000011, PCS0000000001
EQT 0040	224 - Cooling Tower	GRP0000000011
EQT 0044	T-225A - Slurry Tank P-501 A	CRG0000000009, GRP0000000011, PCS0000000001
EQT 0045	T-225B - Slurry Tank P-501 B	CRG0000000009, GRP0000000011, PCS0000000001
EQT 0046	T-225C - Slurry Tank P-501 C	CRG0000000009, GRP0000000011, PCS0000000001
EQT 0047	T-225D - Slurry Tank P-501 D	CRG0000000009, GRP0000000011, PCS0000000001
EQT 0048	T-225E - Slurry Tank P-501 E	CRG0000000009, GRP0000000011, PCS0000000001
EQT 0049	T-225F - Slurry Tank P-501 F	CRG0000000009, GRP0000000011, PCS0000000001
EQT 0050	T-225G - Slurry Tank P-501 G	CRG0000000009, GRP0000000011, PCS0000000001
EQT 0052	T-225I - Slurry Tank P-514	CRG0000000009, GRP0000000011, PCS0000000001
EQT 0053	T-508 - XDW Tank PT-508	CRG0000000009, GRP0000000011, PCS0000000001
EQT 0054	T-510 - XDW Tank PT-510	CRG0000000009, GRP0000000011, PCS0000000001
EQT 0057	T-103 - PT-103 Tank	GRP0000000011
EQT 0071	PC-201 - Slurry Stripper A	CRG0000000011, GRP0000000011
EQT 0072	PC-202 AV/B/C - Slurry Stripper A/B/C	CRG0000000011, GRP0000000011
EQT 0073	CS - Centrifuges	GRP0000000011
EQT 0074	WW T - Wastewater Tanks	GRP0000000011
EQT 0075	250A/B - Wastewater Strippers A/B	CRG0000000011, GRP0000000011
EQT 0076	VCM - VCM Recovery	GRP0000000011, GRP0000000018
EQT 0139	256 - PVC Dyer	CRG0000000007, GRP0000000011, PCS0000000001
EQT 0141	FO - Filter Openings	GRP0000000011, PCS0000000001
FUG 0001	177 - PVC Plant Fugitive Emissions	GRP0000000011
FUG 0003	258 - PVC Plant Material Handling Fugitive Emissions	GRP0000000011, PCS0000000001
PCS 0001	PCS1 - 257-PVC Unit Process Train	GRP0000000011

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0560	0560 PVC Manufacture (Rated Capacity)	1278	MM lbs/yr

SIC Codes:
 2821 Plastics materials and resins UNF 003

EMISSION RATES FOR CRITERIA POLLUTANTS

All ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
 Activity Number: PER20060005
 Permit Number: 1004-V1
 Air - Title V Regular Permit Major Mod

Subject Item	PM10			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
257-PVC Unit Process Train						
EQT 0011 178A		1.89				5.83
EQT 0012 178B		1.89				5.83
EQT 0013 178C		1.89				5.83
EQT 0014 178D		1.89				5.83
EQT 0015 178E		2.21				4.66
EQT 0016 178F		1.16				5.83
EQT 0018 180		1.02				
EQT 0019 181		1.02				
EQT 0020 182		1.02				
EQT 0021 183		1.02				
EQT 0022 184		1.02				
EQT 0023 185		1.02				
EQT 0024 186		1.02				
EQT 0025 187		1.02				
EQT 0026 188		1.02				
EQT 0027 189		1.02				
EQT 0028 190		1.02				
EQT 0029 191		1.02				
EQT 0030 192			-1.02-			
EQT 0031 193		0.75				
EQT 0032 194		0.75				
EQT 0033 195		0.75				
EQT 0034 196		0.75				

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
Activity Number: PER20060005

Permit Number: 1004-V1

Air - Title V Regular Permit Major Mod

Subject Item	PM10		VOC		Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
	Avg lb/hr	Max lb/hr	Avg lb/hr	Max lb/hr					
287-PVC Unit Process Train									
EQT 0035 197	0.75								
EQT 0036 198	0.75								
EQT 0037 206	0.04				0.19				
EQT 0038 213	2.28				13.99				
EQT 0044 T-225A					<0.001				
EQT 0045 T-225B					<0.001				
EQT 0046 T-225C					<0.001				
EQT 0047 T-225D					<0.001				
EQT 0048 T-225E					<0.001				
EQT 0049 T-225F					<0.001				
EQT 0050 T-225G					<0.001				
EQT 0052 T-225I					<0.001				
EQT 0053 T-508					<0.001				
EQT 0054 T-510					<0.001				
EQT 0139 256	1.89				10.33				
FUG 0003 258	6.30								
PVC Unit									
ARE 0002 216					19.20				
EQT 0017 179					16.85				
EQT 0040 224	3.81				1.78				
EQT 0057 T-103					0.60				
GRP 0011 GRP11	30.14		132.03	30.46		72.77			
PCS 0001 PCS1		39.21			74.26				

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
Activity Number: PER20060005
Permit Number: 1004-V1
Air - Title V Regular Permit Major Mod

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

IP0009145

EMISSION RATES FOR CRITERIA POLLUTANTS**AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant****Activity Number: PER20060005****Permit Number: 1004-V1****Air - Title V Regular Permit Major Mod**

EQT 0027	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0028	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0029	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0030	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0031	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0032	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0033	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0034	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0035	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0036	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0037	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0037	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0038	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0038	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0040	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0040	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0044	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0045	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0046	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0047	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0048	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0049	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0050	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0052	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant

Activity Number: PER20060005

Permit Number: 1004-V1

Air - Title V Regular Permit Major Mod

EQT 0053	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011-PVC Unit CAP Which Months: All Year
EQT 0054	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011-PVC Unit CAP Which Months: All Year
EQT 0139	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP11-PVC Unit CAP Which Months: All Year
EQT 0139	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP11-PVC Unit CAP Which Months: All Year
FUG 0003	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011-PVC Unit CAP Which Months: All Year
GRP 0011	PM10	Avg lb/hr	PVC Unit Emissions CAP, GRP11-PVC Unit CAP Which Months: All Year
GRP 0011	PM10	Tons/year	PVC Unit Emissions CAP, GRP11-PVC Unit CAP Which Months: All Year
GRP 0011	VOC	Avg lb/hr	PVC Unit Emissions CAP, GRP11-PVC Unit CAP Which Months: All Year
GRP 0011	VOC	Tons/year	PVC Unit Emissions CAP, GRP11-PVC Unit CAP Which Months: All Year
PCS 0001	PM10	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011-PVC Unit CAP Which Months: All Year
PCS 0001	VOC	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011-PVC Unit CAP Which Months: All Year

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant

Activity Number: PER20060005

Permit Number: 1004-V1

Air - Title V Regular Permit Major Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
ARE 0002 216	Vinyl chloride		19.20	
EQT 0011 178A	Vinyl chloride		5.83	
EQT 0012 178B	Vinyl chloride		5.83	
EQT 0013 178C	Vinyl chloride		5.83	
EQT 0014 178D	Vinyl chloride		5.83	
EQT 0015 178E	Vinyl chloride		4.66	
EQT 0016 178F	Vinyl chloride		5.83	
EQT 0017 179	Vinyl chloride		16.85	
EOT 0037 208	Vinyl chloride		0.19	
EQT 0038 213	Vinyl chloride		13.99	
EQT 0040 224	1,2-Dichloroethane		0.084	
	Chlorine		1.20	
	Chloroform		0.204	
	Vinyl chloride		0.084	
EQT 0044 T-225A	Vinyl chloride		<0.001	
EQT 0045 T-225B	Vinyl chloride		<0.001	
EQT 0046 T-225C	Vinyl chloride		<0.001	
EQT 0047 T-225D	Vinyl chloride		<0.001	
EQT 0048 T-225E	Vinyl chloride		<0.001	
EQT 0049 T-225F	Vinyl chloride		<0.001	
EOT 0050 T-225G	Vinyl chloride		<0.001	
EQT 0052 T-225I	Vinyl chloride		0.001	
EQT 0053 T-508	Ammonia		<0.001	
	Vinyl chloride		0.001	
EQT 0054 T-510	Ammonia		<0.001	
	Vinyl chloride		<0.001	
EOT 0057 T-103	Methanol			0.06
EQT 0139 256	Vinyl chloride		10.33	
FUG 0001 177	Methanol		0.18	
	Vinyl chloride		1.344	
GRP 0011 CRP11	1,2-Dichloroethane	0.07		0.33
	Ammonia	<0.001		<0.001
	Chlorine	1.00		4.40

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant

Activity Number: PER20060005

Permit Number: 1004-V1

Air - Title V Regular Permit Major Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0011 GRP11	Chloroform	0.17		0.73
	Methanol	1.61		7.06
	Vinyl chloride	20.99		31.28
PCS 0001 PCS1	Ammonia		<0.001	
	Methanol		1.64	
	Vinyl chloride		58.38	
UNF 0003 UNF3	1,2-Dichloroethane			0.33
	Ammonia			<0.001
	Chlorine			4.40
	Chloroform			0.73
	Methanol			31.06
	Vinyl chloride			31.28

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

Emission Rates Notes:

ARE 0002	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0011	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0012	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0013	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0014	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0015	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0016	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0017	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0037	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0038	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0040	1,2-Dichloroethane	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0040	Chlorine	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0040	Chloroform	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0040	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0044	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0045	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0046	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0047	Vinyl chloride	Max lb/hr	This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant

Activity Number: PER20060005

Permit Number: 1004-V1

Air - Title V Regular Permit Major Mod

EQT 0048	Vinyl chloride	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0049	Vinyl chloride	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0050	Vinyl chloride	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0052	Vinyl chloride	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0053	Ammonia	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0053	Vinyl chloride	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0054	Ammonia	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0054	Vinyl chloride	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0057	Methanol	Tons/Year	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
EQT 0139	Vinyl chloride	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
FUG 0001	Methanol	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
FUG 0001	Vinyl chloride	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	1,2-Dichloroethane	Avg lb/hr	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	1,2-Dichloroethane	Tons/Year	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	Ammonia	Avg lb/hr	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	Ammonia	Tons/Year	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	Chlorine	Avg lb/hr	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	Chlorine	Tons/Year	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	Chloroform	Avg lb/hr	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	Chloroform	Tons/Year	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	Methanol	Avg lb/hr	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	Methanol	Tons/Year	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	Vinyl chloride	Avg lb/hr	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
GRP 0011	Vinyl chloride	Tons/Year	. PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
PCS 0001	Ammonia	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
PCS 0001	Methanol	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year
PCS 0001	Vinyl chloride	Max lb/hr	. This source operates under a CAP. The emissions shall be limited to the rates listed in the PVC Unit Emissions CAP, GRP011- PVC Unit CAP Which Months: All Year

SPECIFIC REQUIREMENTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
Activity Number: PER20060005
Permit Number: 1004-V1
Air - Title V Regular Permit Major Mod

Group: PCS 0001 257-PVC Unit Process Train

Group Members: CRC CRC CRC CRC
 0007 0008 0009
 EQT 0027EQT 0028EQT 0029EQT 0030EQT 0031EQT 0032EQT 0033EQT 0034EQT 0035EQT 0036EQT 0037EQT 0038EQT 0044EQT 0045EQT 0046EQT 0047EQT 0048EQT 0049EQT 0050EQT 0052EQT 0053EQT 0054EQT 0139EQT 0141FUG 0003

CRG 0007 CRG7 - PVC Dryers

Group Members: EQT 0011EQT 0012EQT 0013EQT 0014EQT 0015EQT 0016EQT 0017EQT 0018EQT 0019EQT 0020EQT 0021EQT 0022EQT 0023EQT 0024EQT 0025EQT 0026

1 [LAC 33:III.1311.B]

Total suspended particulate <= 48.0 lb/hr. The rate of emission for drying operations shall be the total of all emission points from the source.
 Which Months: All Year Statistical Basis: None specified

2 [LAC 33:III.501.C.6]

Flow rate >= 1.2 gallons/min: The wet scrubbers (Emission Points 178A through 178F, 206, 213 and 256) shall operate as specified using water as the scrubbing agent while dryers are in operation (not required when dryers are down).
 Which Months: All Year Statistical Basis: Constant

3 [LAC 33:III.501.C.6]

Flow rate - Submit report: Due annually, by the 31st of March, listing the hours that the scrubber operated out of the ranges specified shall be submitted to the Office of Environmental Compliance, Enforcement Division, for the preceding calendar year.

4 [LAC 33:III.501.C.6]

Flow rate: As applied to the multicyclones and wet scrubbers, a flow monitoring excursion is defined as "when the period of control device or recovery device operation is 4 hours or greater in an operating day and monitoring data are insufficient to constitute a valid hour of data for at least 75 percent of the operating hours".

5 [LAC 33:III.501.C.6]

Particulate matter (10 microns or less): The high efficiency multicyclones and wet scrubbers (Emission Points 178A through 178F, 206, 213 and 256) shall be maintained and operated with an overall efficiency of 99.99%. Vents shall be visually inspected on a daily basis. If visible emissions are detected, the permittee shall conduct a six minute opacity reading in accordance with EPA Reference Method 9 within three working days. Maintenance inspection shall be performed every six months and whenever visual checks indicate maintenance may be necessary. Maintenance shall be performed as necessary. (State Only Requirement).

6 [LAC 33:III.501.C.6]

Inspection records recordkeeping by electronic or hard copy daily. Records of the multicyclones and wet scrubbers visual checks, maintenance inspections, and scrubber flow rates shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.

7 [LAC 33:III.501.C.6]

Flow rate: For purposes of complying with the continuous flow monitoring and recording requirements specified for the multicyclones and wet scrubbers, a "continuous flow recorder means a data recording device that either records an instantaneous data value at least once every 15 minutes or records 15-minute or more frequent block average values" unless a malfunction occurs with the monitoring system. In cases where automated, computer generated flow data is not available, permittee will manually record flow data hourly.

8 [LAC 33:III.501.C.6]

Particulate matter (10 microns or less) >= 99.99 % capture and % DRE. The high efficiency multicyclones and wet scrubbers on the dryers (Emission Points 178A through F, 206, 213 and 256). PSD-LAF-546 (M-2).

Which Months: All Year Statistical Basis: Allowed concentration

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Permittee shall strip PVC slurry to 35 ppm vinyl chloride or less on a reporting quarterly average. The daily averages and the quarterly average, and calculated total VCM emissions in tons/quarter after the stripper shall be reported quarterly to the Air Quality Division concurrently with the NESSTHAP Subpart F quarterly report. Determined as MACT (State Only Requirement).

SPECIFIC REQUIREMENTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
 Activity Number: PER20060005
 Permit Number: 1004-V1
 Air - Title V Regular Permit Major Mod

Group: PCS 0001 257 PVC Unit Process Train**CRG 0008 CRG8 - PVC Loading and Storage Silos**

Group Members: EQT 0018EQT 0019EQT 0020EQT 0021EQT 0022EQT 0023EQT 0024EQT 0025EQT 0026EQT 0027EQT 0028EQT 0029EQT 0030EQT 0031EQT 0032EQT 0033EQT 0034EQT 0035EQT

EQT 0036

- 10 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. Opacity <= 20 percent, except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). Which Months: All Year Statistical Basis: Six-minute average
- 11 [LAC 33:III.1311.C] The dust filters (Emission Points 180-198) shall be maintained and operated so that particulate removal efficiencies of >/= 99.99% are maintained. Filter vents shall be visually inspected on a daily basis. The filter elements (bags) shall be inspected every six months and whenever visual checks indicate maintenance may be necessary. Elements shall be changed as necessary. Records of visual checks and maintenance inspections of the dust filters shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. PSD-LA-546 (M-2).
- 12 [LAC 33:III.501.C.6] Particulate matter (10 microns or less) >= 99.99 % capture and % DRE: The dust filters (Emission Points 180-198). PSD-LA-546 (M-2). Which Months: All Year Statistical Basis: Allowed concentration

CRG 0009 CRG9 - PVC Unit Slurry and XDW Tanks

Group Members: EQT 0044EQT 0045EQT 0046EQT 0047EQT 0048EQT 0049EQT 0050EQT 0051EQT 0053EQT 0054

- 14 [40 CFR 61.64.c.1.(iii)] Weighted average residual concentration on each calendar day: Vinyl chloride <= 400 ppm in all PVC resins except dispersion resins, including latex resins, averaged separately for each type of resin, measured immediately after the stripping operation is completed. Subpart F. [40 CFR 61.64(e)(1)(ii)] Which Months: All Year Statistical Basis: None specified Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Permittee shall strip PVC slurry to 35 ppm vinyl chloride or less on a reporting quarterly average. The daily averages and the quarterly average, and calculated total VCM emissions in tons/quarter after the stripper shall be reported quarterly to the Air Quality Division concurrently with the NESHAP Subpart F quarterly report. Determined as MACT. (State Only Requirement).

FUG 0003 258 - PVC Plant Material Handling Fugitive Emissions

- 15 [LAC 33:III.5109.A] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7.

ARE 0002 216 - QA Lab Vents

SPECIFIC REQUIREMENTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
Activity Number: PER20060005
Permit Number: 1004-V1
Air - Title V Regular Permit Major Mod

ARE 0002 216 - QA Lab Vents

17 [LAC 33:III 5109.A]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. No control is determined as MACT.

CRG 0011 CRG11 - Strippers

Group Members: EQT 0071EQT 0072EQT 0075

18 [40 CFR 61.64.e.1.(ii)]

Weighted average residual concentration on each calendar day: Vinyl chloride <= 400 ppm in all PVC resins except dispersion resins, including latex resins, averaged separately for each type of resin, measured immediately after the stripping operation is completed. Subpart F. [40 CFR 61.64(e)(1)(ii)]

19 [LAC 33:III 5109.A]

Which Months: All Year Statistical Basis: None specified
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Permittee shall strip PVC slurry to 35 ppm vinyl chloride or less on a reporting quarterly average. The daily averages and the quarterly average, and calculated total VCM emissions in tons/quarter after the stripper shall be reported quarterly to the Air Quality Division concurrently with the NESMAP Subpart F quarterly report. Determined as MACT.

EQT 0017 179 - PVC Reactor Opening Emissions

20 [40 CFR 61.64.a.1]

Vinyl chloride <= 10 ppm, except as provided in 40 CFR 61.64(a)(2) and 61.65(a). Subpart F. [40 CFR 61.64(a)(1)]
 Which Months: All Year Statistical Basis: Three-hour average
 Reactor opening loss for each reactor: Vinyl chloride <= 0.02 g/kg (0.04 lb/ton) of polyvinyl chloride product, except as provided in 40 CFR 61.64(f)(1), with the product determined on a dry solids basis. Subpart F. [40 CFR 61.64(a)(2)]

21 [40 CFR 61.64.a.2]

Which Months: All Year Statistical Basis: None specified
 Do not discharge to the atmosphere from any manual vent valve on a polyvinyl chloride reactor in vinyl chloride service, except for an emergency manual vent valve discharge. Subpart F. [40 CFR 61.64(a)(3)]

22 [40 CFR 61.64.a.3]

Vinyl chloride monitored by the regulation's specified method(s) as needed. Monitor emissions from the sources for which emission limits are prescribed in 61.64(a)(1), (b), (c) and (d), and for any control system to which reactor emissions are required to be ducted in 40 CFR 61.65(b)(1)(ii) and (b)(2), (b)(5), (b)(6)(ii) and (b)(9)(ii). Use a device that meets the requirements in 40 CFR 61.68(b). Subpart F.
 Which Months: All Year Statistical Basis: Approved basis
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Record the information specified in 40 CFR 61.71(a)(1) through (a)(4) and make it available for inspection to DEQ for a minimum of three years. Subpart F. [40 CFR 61.71(a)]

23 [40 CFR 61.68]

— Permittee shall measure the charge to the reactors at the load cell on the charge pot, by level gauge on the charge pot, and by flow meter to the reactor. PSD-LA-546 (M-2).

24 [40 CFR 61.71.a]

— Permittee shall install a gas holder capable of receiving vinyl vents from the PVC reactors at pressures greater than normal operating pressure but less than safety relief valve pressure. PSD-LA-546 (M-2).
 The permittee shall have a short stop system to terminate the reaction in case of emergency. The short stop shall be both gravity feed and pressure feed by a dedicated nitrogen source. PSD-LA-546 (M-2).

SPECIFIC REQUIREMENTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant

Activity Number: PER20060005

Permit Number: 1004-V1

Air - Title V Regular Permit Major Mod

EQT 0017 179 - PVC Reactor Opening Emissions

28 [LAC 33:III.5109.A]

Reactor opening loss shall not exceed: Vinyl chloride $\leq 0.000004 \text{ lb/lb}$ (0.0004 gm/kg) of polyvinyl chloride product with the product determined on a dry solids basis. Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Meeting this limit is determined as MACT.

EQT 0040 224 - Cooling Tower

29 [LAC 33:III.1311.C]

Opacity ≤ 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Month: All Year Statistical Basis: Six-minute average

EQT 0073 CS - Centrifuges

30 [40 CFR 61.64.e.1.(ii)]

Weighted average residual concentration on each calendar day: Vinyl chloride $\leq 400 \text{ ppm}$ in all PVC resins except dispersion resins, including latex resins, averaged separately for each type of resin, measured immediately after the stripping operation is completed. Subpart F. [40 CFR 61.64(e)(1)(ii)]

Which Month: All Year Statistical Basis: None specified

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Permittee shall strip PVC slurry to 35 ppm vinyl chloride or less on a reporting quarterly average. The daily averages and the quarterly average, and calculated total VCM emissions in tons/quarter after the stripper shall be reported quarterly to the Air Quality Division concurrently with the NESMAP Subpart F quarterly report. Determined as MACT.

FUG 0001 177 - PVC Plant Fugitive Emissions

32 [LAC 33:III.2111]

Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.

The number of each type of component required to be monitored for each monitoring period under applicable leak detection and repair programs shall be reported to the Department by inclusion with each periodic monitoring report. Fugitive emission piping components may be added to or removed from the permitted units, without triggering the need to apply for a permit modification, provided:

- a. Changes in components involve routine maintenance or are undertaken to address safety concerns, or involve small piping revisions with no associated emissions increases except from the fugitive emissions components themselves;
- b. The changes do not involve any associated increase in production rate or capacity, or tie in of new or modified process equipment other than the piping components;
- c. Actual emissions following the changes will not exceed the emission limits contained in this permit; and
- d. The components are promptly incorporated into any applicable leak detection and repair program

34 [LAC 33:III.501.C.6]

Comply with LAC 33:III.2122 - Fugitive Emission Control for Ozone Nonattainment Areas and Specified Parishes by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with LAC 33:III.Chapter 51 - Louisiana MACT Determination for Non-HON Sources.

SPECIFIC REQUIREMENTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
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Permit Number: 1004-V1
Air • Title V Regular Permit Major Mod

FUG 0001 177 - PVC Plant Fugitive Emissions

- 35 [LAC 33:III.507.H] Comply with 40 CFR 61 Subpart F- National Emission Standard for Vinyl Chloride by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with LAC 33:III Chapter 51 - Louisiana MACT Determination for Non-HON Sources.
- 36 [LAC 33:III.507.H] Comply with 40 CFR 61 Subpart V- National Emission Standard for Equipment Leaks (Fugitive Emission Sources) by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with LAC 33:III Chapter 51- Louisiana MACT Determination for Non-Hon Sources.
- 37 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
- 38 [LAC 33:III.5109.A] Compressors: Equip each barrier fluid system as described in Subsections E.2 through E.4 with a sensor that will detect failure of the seal system, the barrier fluid system, or both, as specified in Subsection E.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 39 [LAC 33:III.5109.A] Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.1.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, monitor within 5 days by the methods specified in Subsection P.2.
- 40 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified VOC, Total monitored by portable analyzer at the regulation's specified frequency. Monitor using VOC analyzer and Method 21 as part of Leak Detection and Repair (LDAR) program in compliance with LA Non-HON MACT as indicated in the streamlined fugitives monitoring program.
- 41 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: Not applicable Attach a weatherproof and readily visible identification, marked with the equipment identification, to leaking equipment, as specified in Subsection Q.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 42 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (skip period leak detection and repair): Notify DEQ 30 days before implementing any of the alternate provisions of Section J, as specified in Subsection R.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 43 [LAC 33:III.5109.A] Compressors: Equip with a closed-vent system capable of capturing and transporting any leakage from the seal to a control device that complies with the requirements of Section N, except as provided for in Subsection E.10, as specified in Paragraph E.9 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Alternative to Subsections E.1 through E.7.
- 44 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar), as specified in Paragraph D.4.d of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
- 45 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Pumps in light liquid service: Equip with a closed-vent system capable of capturing and transporting any leakage from the seal or seals to a control device that complies with the requirements of Section N, as specified in Paragraph D.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Alternative to Subsections D.1 through D.4.
- 46 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in VOTAP service and, if the pump is covered by standards under NSPS, is not in VOC service, as specified in Paragraph D.4.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.

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AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
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 Air - Title V Regular Permit Major Mod

FUG 0001 177 - PVC Plant Fugitive Emissions

- 47 [LAC 33:III.5109.A] Submit report: Due semiannually starting six months after the initial report required in Subsection R.1. Include the information specified in Paragraphs R.2.a through R.2.e, as specified in Subsection R.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Connectors in gas/vapor service and in light liquid service: Repair Leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Subsection O.8. Make a first attempt at repair no later than 5 calendar days after each leak is detected. If a leak is detected, monitor the for leaks within the first 90 days after its repair, as specified in Subsection O.9 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 48 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than two meters above a support service, as specified in Subsection I.6.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection I.1.
- 49 [LAC 33:III.5109.A] Pumps in light liquid service (unmanned plant site): Presence of a leak monitored by visual inspection/determination at the regulation's specified frequency, as specified in Subparagraph D.6 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor pump as often as practicable and at least monthly. Comply with this requirement instead of the weekly visual inspection requirements in Paragraphs D.1.b and D.4.d, and the daily requirements in Paragraph D.4.e.i.
- 50 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Valves in gas/vapor service and in light liquid service (percent leaking valves ≥ 4): Total monitored by the regulation's specified method(s) monthly, as specified in Subsection I.7 of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Subsection P.2. Initiate monthly monitoring within 60 days of the previous monitoring and continue until the percent of leaking valves is less than 4, at which time monitoring can be performed in accordance with Subsection I.1.
- 51 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Valves in gas/vapor service and in light liquid service (unsafe-to-monitor): Demonstrate that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with Subsection I.1, as specified in Subsection I.5.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection I.1.
- 52 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service (percent leaking valves ≤ 2 for two consecutive quarterly leak detection periods): VOC, Total monitored by the regulation's specified method(s) semiannually, as specified in Paragraph J.2.a of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Section P. If the percentage of valves leaking is greater than 2 for any monitoring period, comply with the requirements as described in Section I, as specified in Paragraph J.2.c of the Louisiana MACT Determination for Refinery Equipment Leaks (July 26, 1994). Optional alternative to quarterly monitoring.
- 53 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service and in light liquid service (opened or otherwise had the seal broken): VOC, Total monitored by the regulation's specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had the seal broken, including those determined to be unrepairable prior to process unit shutdown, as specified in Paragraph O.8.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up monitoring detects a leak, initiate repair provisions specified in Subsection O.9, unless it is determined to be unrepairable, in which case it is counted as unrepairable.
- 54 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
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Permit Number: 1004-V1
Air - Title V Regular Permit Major Mod

FUG 0001 177 - PVC Plant Fugitive Emissions

- 55 [LAC 33:III.5109.A] Compressors (no detectable emissions): Demonstrate that the compressor is operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in Subsection P.3, as specified in Paragraph E.10.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsections E.2 through E.9.
- 56 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: Equip with a closed-vent system capable of capturing and transporting leakage from the pressure relief device to a control device as described in Section N, as specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Alternative to Subsections E.1 and F.2.
- 57 [LAC 33:III.5109.A] Compressors: Equip with a seal system that includes a barrier fluid system and that prevents leakage of process fluid to the atmosphere, except as provided for in Subsections C.4, E.9 and E.10, as specified in Subsection E.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 58 [LAC 33:III.5109.A] Delay of Repair: Repair equipment before the end of the next process unit shutdown, if repair is technically infeasible without a process unit shutdown, as specified in Subsection M.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 59 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure, or equip with a barrier fluid degassing reservoir that is connected by a closed-vent system to a control device that complies with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emissions to the atmosphere, as specified in Paragraph D.4.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 60 [LAC 33:III.5109.A] Sampling connection systems (closed-purge or closed-vent system): Return the purged process fluid directly to the process line with zero VOTAP emissions to the atmosphere, or collect and recycle the purged process fluid with zero VOTAP emissions to the atmosphere, or be designed and operated to capture and transport all the purged process fluid to a control device that complies with the requirements of Section N, as specified in Subsection G.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 61 [LAC 33:III.5109.A] Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: VOC, Total monitored by the regulation's specified method(s) within 5 days of finding evidence of a potential leak by visual, audible, olfactory, or any other detection method, as specified in Section K.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. If an instrument reading of 10000 ppm or greater for agitators, 2000 ppm or greater for pumps or 1000 ppm or greater for valves, connectors, instrument systems, or pressure relief devices is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection K.3.
- 62 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in Subsections Q.1 through Q.13 as applicable, as specified in Section Q of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 63 [LAC 33:III.5109.A] Pumps in light liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection D.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 64 [LAC 33:III.5109.A] Pressure relief device in gas/vapor service: After each pressure release, return to a condition of no leakage, as indicated by an instrument reading of less than 500 ppm, as soon as practicable, but no later than five calendar days after each pressure release, except as provided in Section M, as specified in Section F.2.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).

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AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
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FUG 0001 177 - PVC Plant Fugitive Emissions

- 65 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (welded completely around the circumference of the interface or physically removed and the pipe welded together): Equipment/operational data monitored by the regulation's specified method(s) within three months after being welded. Check the integrity of the weld by monitoring according to the procedures in Section P or by testing using x-ray, acoustic monitoring, hydrotesting, or other applicable method, as specified in Subsection O.7 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection O.
- Which Months: All Year Statistical Basis: None specified
- Equipment/operational data recordkeeping by the regulation's specified method(s) at the regulation's specified frequency. Maintain records per requirements described in LA Non-HON MACT as indicated in the streamlined fugitives monitoring program. Keep records on site for a minimum of five (5) years.
- Compressors: Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both, as specified in Paragraph E.6.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Compressors (seal system): VOC, Total monitored by the regulation's specified method(s) quarterly, as specified in Subsection E. 1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor to detect leaks using the methods specified in Section P. If an instrument reading of 5000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection E.8.
- Which Months: All Year Statistical Basis: None specified
- VOC, Total monitored by technically sound method within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled to determine if it is leaking, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Which Months: All Year Statistical Basis: None specified
- Identify each piece of equipment in a process unit subject to this MACT determination such that it can be distinguished readily from equipment that is not subject to this MACT determination, as specified in Subsection C.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Connectors in gas/vapor service and in light liquid service (≤ 1 inch in diameter): Comply with the requirements of Section K, as specified in Paragraph O.8.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Paragraph O.2.
- Connectors in gas/vapor service and in light liquid service: Calculate the percent leaking connectors using the equation in Subsection O.12 for use in determining the monitoring frequency, as specified in Subsection O.12 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Valves in gas/vapor service and in light liquid service (difficult-to-monitor): VOC, Total monitored by the regulation's specified method(s) at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valve at least once per calendar year, as specified in Subsection I.6.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. Comply with this requirement instead of the requirements in Subsection I.1.
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
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FUG 0001 177 - PVC Plant Fugitive Emissions

- 74 [LAC 33.III.S109.A] Connectors in gas/vapor service and in light liquid service (<= 1 inch in diameter): VOC, Total monitored by the regulation's specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had the seal broken, as specified in Paragraph O.8.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up monitoring detects a leak, initiate repair provisions specified in Subsection O.9. Comply with this requirement instead of the requirements in Paragraph O.2.
- Which Months: All Year Statistical Basis: None specified
- Pressure relief device in gas/vapor service: VOC, Total monitored by the regulation's specified method(s) within 5 days (calendar) after the pressure release to confirm the condition of no leakage, as indicated by an instrument reading of less than 500 ppm above background, as specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.3.
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- Open-ended valves or lines: Monitor and repair in accordance with Section I, as specified in Subsection H.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Connectors in gas/vapor service and in light liquid service: VOC, Total monitored by the regulation's specified method(s) once initially, as specified in Subsections O.1 and O.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If an instrument reading \geq 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
- Which Months: All Year Statistical Basis: None specified
- Equipment/operational data: Submit semiannual report: Date of Submittal per requirements described in LA Non-HON MACT.
- Open-ended valves or lines (equipped with a second valve): Operate in a manner such that the valve on the process fluid end is closed before the second valve is closed, as specified in Subsection H.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Connectors in gas/vapor service and in light liquid service (percent of leaking connectors > 2): VOC, Total monitored by the regulation's specified method(s) quarterly until good performance is obtained or until four quarterly monitorings have been performed, as specified in Subsections O.2 and O.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If good performance has not been obtained after four quarters of monitoring, monitor the remaining unchecked connectors within six months of the last quarterly monitoring period, as specified in Subsection O.6 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If monitoring of the remaining connectors indicates good performance, monitor in accordance with Subsection O.4. If monitoring of the remaining connectors indicates that good performance has not been obtained, monitor in accordance with Subsection O.5: Monitor using the method specified in Section P. If an instrument reading \geq 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
- Which Months: All Year Statistical Basis: None specified
- VOC, Total recordkeeping by logbook within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled. Maintain records as required in Subsection Q.5, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).

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AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
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FUG 0001 177 - PVC Plant Fugitive Emissions

- 83 [LAC 33:III.5109.A] Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve that seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line or during maintenance and repair, as specified in Subsection H.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both, as specified in Subparagraph D.4.e.ii of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1. Comply with the test methods and procedures in Section P, as specified in Subsections P.1 through P.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Connectors in gas/vapor service and in light liquid service (unsafe-to-monitor): Determine that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with Subsections O.2 through O.6, as specified in Subsection O.10.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection O.2 through O.6.
- Compressors (no detectable emissions): VOC, Total monitored by the regulation's specified method(s) once initially upon designation, annually, and at other times requested by DEQ, as specified in Paragraph E.10.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsections E.2 through E.9.
- Which Months: All Year Statistical Basis: None specified
- Surge control vessels and bottoms receivers: Equip each surge control vessel and bottoms receiver that is not routed back to the process with a closed-vent system that routes the organic vapors vented from the vessel back to the process or to a control device that complies with the requirements of Section N or to an alternate method of control which has been approved by DEQ, as specified in Section L of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- Compressors: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection E.8 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- Pumps in light liquid service (dual mechanical seal system): Equipment/operational data monitored by visual inspection/determination daily. Check sensor daily or equip with an audible alarm, as specified in Subparagraph D.4.e.i of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined in Paragraph D.4.e.ii, a leak is detected. If a leak is detected, initiate repair provisions specified in Paragraphs D.3.a and D.3.b. Comply with this requirement instead of the requirements in Subsection D.1.
- Which Months: All Year Statistical Basis: None specified
- Pumps in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly. Monitor to detect leaks using the methods specified in Subsection P.2, except as provided in Subsection C.4 and Subsections D.4, D.5, and D.6, as specified in Paragraph D.1.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If an instrument reading of 2000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate repair provisions as specified in Subsection D.3.
- Which Months: All Year Statistical Basis: None specified

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AIR ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant
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 Permit Number: 1004-V1
 Air - Title V Regular Permit Major Mod

FUG 0001 177 - PVC Plant Fugitive Emissions

- 92 [LAC 33:III.5109.A] Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection K.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected.
- 93 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (percent of leaking connectors <= 2): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Subsections O.2 and O.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitoring must be performed within one year from the previous monitoring. Monitor using the method specified in Section P. If an instrument reading $\geq 1000 \text{ ppm}$ is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M.
- 94 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service and in light liquid service (unsafe-to-monitor): VOC, Total monitored by the regulation's specified method(s) at the regulations specified frequency. Maintain a written plan that requires monitoring as frequently as practicable during safe to monitor periods, as specified in Subsection O.10.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method in Section P. Comply with this requirement instead of the requirements in Subsection O.2 through O.6.
- 95 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: None specified Compressors (seal system): Operate with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure, or equip with a barrier fluid system that is connected by a closed-vent system to a control device that complies with the requirements of Section N, or equip with a system that purges the barrier fluid into a process stream with zero VOTAP emission to the atmosphere, as specified in Subsection E.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).
- 96 [LAC 33:III.5109.A] Connectors in gas/vapor service and in light liquid service (inaccessible or glass or glass-lined). Repair leaks as soon as practicable, but no later than 15 calendar days after detecting a leak by visual, audible, olfactory or other means, except as specified in Subsection O.8, as specified in Subsection O.11.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after the leak is detected, as specified in Subsection O.11.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the monitoring requirements of Subsection O.2 through O.6 and the recordkeeping and reporting requirements.
- 97 [LAC 33:III.5109.A] Pumps in light liquid service (dual mechanical seal system): Equip each barrier fluid system with a sensor that will detect failure of the seal system, the barrier fluid system, or both, as specified in Paragraph D.4.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection D.1.
- 98 [LAC 33:III.5109.A] Sampling connection systems: Equip with a closed-purge system or closed-vent system, except as provided for in Section C, as specified in Subsection G.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Ensure that this system collects or captures the sample purge for return to the process.
- 99 [LAC 33:III.5109.A] Valves in gas/vapor service and in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly, as specified in Subsection I.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. If an instrument reading of 1000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection I.3.
- Which Months: All Year Statistical Basis: None specified

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FUG 001 177 - PVC Plant Fugitive Emissions

100 [LAC 33:III.5109.A]

Compressors: Ensure that the barrier fluid is not in VOTAP service and, if the compressor is covered by a standard under NSPS, is not in VOC service, as specified in Subsection E.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995).

Compressors: Equipment/operational data monitored by technically sound method daily, as specified in Paragraph E.6.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Check each sensor as required in Subsection E.5 daily or equip with an audible alarm unless the compressor is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on criterion determined under Paragraph E.6.b, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection E.8.

Which Months: All Year Statistical Basis: None specified

Vinyl chloride: Louisiana Fugitive Emission Program Consolidation Guidelines:

Comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the applicable fugitive emission monitoring programs being streamlined as shown below.

Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
a. 40 CFR 61 Subpart F (Vinyl Chloride)	10% Vinyl Chloride	LAC 33:III.5109 (LA Non-HON)
b. 40 CFR 61 Subpart V (Equipment Leaks)	10% VHAP	
c. LAC 33:III.2122		
d. LAC 33:III.5109 (LA Non-HON)	10% VOC	
	5% VOC TAP	

Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emissions programs.

Vinyl chloride: Louisiana Fugitive Emission Program Consolidation Guidelines:

Streamlined program Condition B. Use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.

Vinyl chloride: Louisiana Fugitive Emission Program Consolidation Guidelines:

Streamlined program Condition C. Comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on July 21 and January 21, to cover the periods of January 1 through June 30 and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

Vinyl chloride: Louisiana Fugitive Emission Program Consolidation Guidelines:

Streamlined program Condition A. Apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program (LA Non-HON) shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size of component available in any of the programs being streamlined.

GRP 0011 GRP11 - PVC Unit CAP

Group Members: ARE 0002EQT 0011EQT 0012EQT 0013EQT 0014EQT 0015EQT 0016EQT 0017EQT 0018EQT 0019EQT 0021EQT 0022EQT 0023EQT 0024EQT 0025EQT 0026EQT 0027

SPECIFIC REQUIREMENTS

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115 [40 CFR 61.64.e.1.(ii)]

Weighted average residual concentration on each calendar day. Vinyl chloride ≤ 400 ppm in all PVC resins except dispersion resins, including latex resins, averaged separately for each type of resin, measured immediately after the stripping operation is completed. Subpart F. [40 CFR 61.64(e)(1)(ii)]

116 [40 CFR 61.64.e.]

Which Months: All Year Statistical Basis: None specified
 Vinyl chloride monitored by the regulation's specified method(s) at the regulation's specified frequency. To demonstrate compliance with 40 CFR 61.64(e), permittee shall measure and record the VCM residue in PVC slurry using the methods described in 40 CFR 61.67(g)(3) and 61.70(c)(2) and the equation included in 40 CFR 61.70(c)(2)(v). [40 CFR 61.64(e)]

117 [40 CFR 61.64.f.1.(ii)]

Which Months: All Year Statistical Basis: Daily average
 Reactor opening loss and all sources following the reactor used as a stripper. Vinyl chloride ≤ 0.42 g/kg (0.84 lb/ton) of PVC product for all PVC resins except dispersion resins, including latex resins, with the product determined on a dry solids basis. Subpart F. [40 CFR 61.64(f)(1)(ii)]

118 [40 CFR 61.65.a]

Which Months: All Year Statistical Basis: None specified
 Relief valves: Do not discharge to the atmosphere from any relief valve on any equipment in vinyl chloride service, except for an emergency relief discharge, and except as provided in 40 CFR 61.65(d). Subpart F. [40 CFR 61.65(a)]

119 [40 CFR 61.65.a]

Relief valves: Submit report in writing within 10 days of any relief valve discharge, except for those subject to 40 CFR 61.65(d).-Submit a report containing information on the source,-nature and cause of the discharge, the date and time of the discharge, the approximate total vinyl chloride loss during the discharge, the method used for determining the vinyl chloride loss (the calculation of the vinyl chloride loss), the action that was taken to prevent the discharge, and measures adopted to prevent future discharges. Subpart F. [40 CFR 61.65(a)]

120 [40 CFR 61.65.b.1.(i)]

Loading and unloading lines: Vinyl chloride $\leq 0.0038 \text{ m}^3 (0.13 \text{ ft}^3)$ at standard pressure, in all parts of each loading or unloading line that

are to be opened to the atmosphere, after each loading or unloading operation and before opening a loading or unloading line to the atmosphere. Subpart F. [40 CFR 61.65(b)(1)(i)]

121 [40 CFR 61.65.b.1.(ii)]

Which Months: All Year Statistical Basis: None specified
 Loading and unloading lines: Duct any vinyl chloride removed from a loading or unloading line in accordance with 40 CFR 61.65(b)(1)(i) through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppm (average for 3-hour period), or equivalent as provided in 40 CFR 61.66. Subpart F. [40 CFR 61.65(b)(1)(ii)]

122 [40 CFR 61.65.b.2]

Slip gauges: Minimize vinyl chloride emissions during loading or unloading operations by ducting any vinyl chloride discharged from the slip gauge through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppm (average for 3-hour period), or equivalent as provided in 40 CFR 61.66. Subpart F. [40 CFR 61.65(b)(2)]

123 [40 CFR 61.65.b.3.(i)]

Pumps (rotating): Minimize vinyl chloride emissions from seals on all rotating pumps by installing sealless pumps, pumps with double mechanical seals, or equivalent as provided in 40 CFR 61.66. If double mechanical seals are used, minimize vinyl chloride emissions from the seals by maintaining the pressure between the two seals so that any leak that occurs is into the pump; by ducting any vinyl chloride between the two seals through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppm; or equivalent as provided in 40 CFR 61.66. Subpart F. [40 CFR 61.65(b)(3)(i)]

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- 124 [40 CFR 61.65 b.3.(iii)] Pumps (reciprocating): Minimize vinyl chloride emissions from seals on all reciprocating pumps by installing double outboard seals, or equivalent as provided in 40 CFR 61.66. If double outboard seals are used, minimize vinyl chloride emissions from the seals by maintaining the pressure between the two seals so that any leak that occurs is into the pump; by ducting any vinyl chloride between the two seals through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppm; or equivalent as provided in 40 CFR 61.66. Subpart F. [40 CFR 61.65(b)(3)(ii)]
- Compressors (rotating): Minimize vinyl chloride emissions from seals on all rotating compressors by installing compressors with double mechanical seals, or equivalent as provided in 40 CFR 61.66. If double mechanical seals are used, minimize vinyl chloride emissions from the seals by maintaining the pressure between the two seals so that any leak that occurs is into the compressor; by ducting any vinyl chloride between the two seals through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppm; or equivalent as provided in 40 CFR 61.66. Subpart F. [40 CFR 61.65(b)(3)(iii)]
- Compressors (reciprocating): Minimize vinyl chloride emissions from seals on all reciprocating compressors by installing double outboard seals, or equivalent as provided in 40 CFR 61.66. If double outboard seals are used, minimize vinyl chloride emissions from the seals by maintaining the pressure between the two seals so that any leak that occurs is into the compressor; by ducting any vinyl chloride between the two seals through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppm; or equivalent as provided in 40 CFR 61.66. Subpart F. [40 CFR 61.65(b)(3)(iv)]
- Agitators: Minimize vinyl chloride emissions from seals on all agitators by installing agitators with double mechanical seals, or equivalent as provided in 40 CFR 61.66. If double mechanical seals are used, minimize vinyl chloride emissions from the seals by maintaining the pressure between the two seals so that any leak that occurs is into the agitated vessel; by ducting any vinyl chloride between the two seals through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppm; or equivalent as provided in 40 CFR 61.66. Subpart F. [40 CFR 61.65(b)(3)(v)]
- Relief valves (leaks): Comply with 40 CFR 61.242-4 of subpart V. Subpart F. [40 CFR 61.65(b)(4)]
- Duct all gases which are manually vented from equipment in vinyl chloride service through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppm (average for 3-hour period), or equivalent as provided in 40 CFR 61.66. Subpart F. [40 CFR 61.65(b)(5)]
- Vinyl chloride \leq 2 percent of the equipment's containment volume, or vinyl chloride \leq 0.0950 cubic meters (25 gallons), whichever is larger, at stand temperature and pressure, before opening any equipment for any reason. Subpart F. [40 CFR 61.65(b)(6)(i)]
- Which Months: All Year. Statistical Basis: None specified
- Duct any vinyl chloride removed from the equipment in accordance with 40 CFR 61.65(b)(6)(i) through a control system from which the concentration of vinyl chloride in the exhaust gas does not exceed 10 ppm (average for 3-hour period) or equivalent as provided in 40 CFR 61.66. Subpart F. [40 CFR 61.65(b)(6)(ii)]
- Return unused portions of samples containing at least 10 percent by weight vinyl chloride to the process or destroy in a control device from which concentration of vinyl chloride in the exhaust gas does not exceed 10 ppm (average for 3-hour period) or equivalent as provided in 40 CFR 61.66. Subpart F. [40 CFR 61.65(b)(7)]
- Operate a reliable and accurate vinyl chloride monitoring system in accordance with the specifications in 40 CFR 61.65(b)(8)(i) for detection of major leaks and identification of the general area of the plant where a leak is located. Subpart F. [40 CFR 61.65(b)(8)(ii)]

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- 134 [40 CFR 61.65.b.8.(ii)]
 Implement a formal leak detection and repair program consistent with 40 CFR 61 Subpart V, except as provided in 40 CFR 61.65(b)(8)(iii).
 Implement this program within 90 days of the effective date of 40 CFR 61 Subpart F. Subpart F. [40 CFR 61.65(b)(8)(ii)]
- 135 [40 CFR 61.65.b.9.(i)]
 Inprocess wastewater (vinyl chloride > 10 ppm): Vinyl chloride \leq 10 ppmw before being mixed with any other inprocess wastewater stream which contains less than 10 ppm vinyl chloride; before being exposed to the atmosphere; before being discharged to a wastewater treatment process; or before being discharged untreated as a wastewater. Subpart F. [40 CFR 61.65(b)(9)(i)]
- 136 [40 CFR 61.65.b.9.(ii)]
 Which Months: All Year. Statistical Basis: None specified
 Inprocess wastewater: Duct any vinyl chloride removed from inprocess wastewater in accordance with 40 CFR 61.65(b)(9)(i) through a control system from which the concentration of vinyl chloride in the exhaust gases does not exceed 10 ppm (average for 3-hour period), or equivalent as provided in 40 CFR 61.66. Subpart F. [40 CFR 61.65(b)(9)(ii)]
- 137 [40 CFR 61.65.c]
 Incorporate the requirements in 40 CFR 61.65(b)(1), (b)(2), (b)(5), (b)(6), (b)(7), and (b)(8) into a standard operating procedure, and make available upon request for inspection by DEQ. Include provisions for measuring the vinyl chloride in equipment 4.75 m³ (1255 gal) in volume for which an emission limit is prescribed in 40 CFR 61.65(b)(6)(i) after opening the equipment and using Method 106, a portable hydrocarbon detector, or an alternative method. Subpart F. [40 CFR 61.65(c)]
- 138 [40 CFR 61.65.d.1]
 Vinyl chloride \leq 10 ppm as determined by the continuous emission monitor system required under 40 CFR 61.68. Subpart F. [40 CFR 61.65(d)(1)]
- 139-[40 CFR 61.67.a.2]
 Which Months: All Year. Statistical Basis: Three-hour average
 Test emissions from the source within 90 days of startup. Conduct test as specified in 40 CFR 61.67(e) through (g). Subpart F. [40 CFR 61.67(a)(2)]
- 140 [40 CFR 61.67.b]
 Provide DEQ at least 30 days prior notice of an emission test to afford DEQ the opportunity to have an observer present during the test. Subpart F. [40 CFR 61.67(b)]
- 141 [40 CFR 61.67.e]
 Submit test results: Due before the close of the next business day following the determination of vinyl chloride emissions. Submit the results by registered letter. Subpart F. [40 CFR 61.67(e)]
- 142 [40 CFR 61.67.f]
 Performance Test Data recordkeeping by electronic or hard copy as needed. Retain at the plant and make available, upon request, for inspection by DEQ, records of emission test results and other data needed to determine emissions. Retain records for a minimum of three years. Subpart F. [40 CFR 61.67(f)]
- 143 [40 CFR 61.68.c]
 Conduct a daily span check for each vinyl chloride monitoring system used, as specified. Subpart F. [40 CFR 61.68(c)]
- 144 [40 CFR 61.68.d]
 Calculate the vinyl chloride content of emissions by best practical engineering judgment based on the discharge duration and known vinyl chloride concentrations in the affected equipment as determined in accordance with 40 CFR 61.68(a) that are emitted to the atmosphere without passing through the control system and required vinyl chloride monitoring system. Subpart F. [40 CFR 61.68(d)]
- 145 [40 CFR 61.68.f]
 Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. For each vinyl chloride emission to the atmosphere determined in accordance with 40 CFR 61.68(e) to be in excess of the applicable emission limits, record the identity of the source(s), the date, time and duration of the excess emission, the cause of the excess emission, and the approximate total vinyl chloride loss during the excess emission, and the method used for determining the vinyl chloride loss. Retain and make available for inspection by DEQ as required by 40 CFR 61.71(a). Subpart F. [40 CFR 61.68(f)]

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UNF 003 UNF3 - PVC Unit

146 [40 CFR 61.68]

Vinyl chloride monitored by continuous emission monitor (CEM) continuously. Monitor emissions from the sources for which emission limits are prescribed in 40 CFR 61.67(a) and (b), 61.63(a), and 61.64(a)(1), (b), (c) and (d), and for any control system to which reactor emissions are required to be ducted in 40 CFR 61.64(a)(2) or to which fugitive emissions are required to be ducted in 40 CFR 61.65(b)(1)(ii) and (b)(2), (b)(5), (b)(6)(ii) and (b)(9)(ii). Use a device that meets the requirements in 40 CFR 61.68(b). Subpart F.

Which Months: All Year Statistical Basis: None specified

Submit statement: Due within 90 days of the effective date of 40 CFR 61 Subpart F, except as specified. Notify DEQ that the equipment and procedural specifications in 40 CFR 61.65(b)(1) through (b)(8) are being implemented. Also include the information specified in 40 CFR 61.69(c)(1) through (c)(4). Subpart F.

Submit statement: Due within 90 days of initial startup date. Notify DEQ that the equipment and procedural specifications in 40 CFR 61.65(b)(1) through (b)(8) are being implemented. Also include the information specified in 40 CFR 61.69(c)(1) through (c)(4). Subpart F. Submit report: Due quarterly, by the 15th of March, June, September and December. Submit report according to the schedule specified in 40 CFR 61.70(a) and (b). Include the information specified in 40 CFR 61.70(c)(1) through (c)(4). Subpart F.

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Record the information specified in 40 CFR 61.71(a)(1) through (a)(4) and make it available for inspection to DEQ for a minimum of three years. Subpart F. [40 CFR 61.71(a)]
 Permittee shall use 40 CFR 61 Subpart F, Appendix B, Method 107 to determine vinyl chloride in PVC resins to demonstrate compliance with the NESHAP standard of 400 ppm VCM in resins (resin discharged from stripper and all other sources downstream of the stripper).
 Permittee shall use 40 CFR 61 Subpart F, Appendix B, Method 107 or Method 601 (incorporated by reference as specified in 40 CFR 61.18); to determine vinyl chloride in inprocess wastewater to demonstrate compliance with 40 CFR 61.65(b)(9).
 Permittee shall use 40 CFR 61 Subpart F, Appendix B, Method 106 to determine vinyl chloride in stack gases to demonstrate compliance with exhaust VCM standard of 10 ppm (stripper vent and all sources preceding stripper, which are ducted first to the recovery system and then to the VCM Plant Incinerators).

All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
 Develop a management system to oversee the implementation of the risk management program elements. [40 CFR 68.15(a)]
 Assign a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements. [40 CFR 68.15(b)]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Document the names or positions of the people, other than the person identified under 68.15(b), who are assigned responsibility for implementing individual requirements of 40 CFR 68. [40 CFR 68.15(c)]
 Define the lines of authority through an organization chart or similar document when responsibility for implementing individual requirements of 40 CFR 68 is assigned to persons other than the person identified under 68.15(b). [40 CFR 68.15(c)]
 Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (f).

Complete a single registration form and include in the RMP. The form shall cover all regulated substances handled in covered processes.
 Include in the registration the information specified in 68.160(b)(1) through (13).
 Submit in the RMP information the release scenarios specified in 68.165(a)(2). Include the data listed in 68.165(b)(1) through (13).

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162 [40 CFR 68.168]

163 [40 CFR 68.175]

164 [40 CFR 68.180]

165 [40 CFR 68.185.b]

166 [40 CFR 68.190.c]

167 [40 CFR 68.200]

168 [40 CFR 68.22]

169 [40 CFR 68.25]

170 [40 CFR 68.28]

171—[40 CFR 68.30]

172 [40 CFR 68.33]

173 [40 CFR 68.36b]

174 [40 CFR 68.36]

175 [40 CFR 68.39]

176 [40 CFR 68.42]

177 [40 CFR 68.65.a]

178 [40 CFR 68.65.d.2]

179 [40 CFR 68.65.d.3]

Submit in the RMP the information provided in 68.42(b) on each accident covered by 68.42(a).

Provide in the RMP the information indicated in 68.175(b) through (p).

Provide in the RMP the emergency response information listed in 68.180(a) through (c).

Provide in the RMP a single certification that, to the best of the signer's knowledge, information, and belief formed after reasonable inquiry, the information submitted is true, accurate, and complete. [40 CFR 68.185(b)]

Submit revised registration to EPA. Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]

Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.

Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.

Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).

Identify and analyze at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes, as specified in 68.28(b) through (e).

Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).

List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a). Submit revised RMP as provided in 40 CFR 68.190. Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source that may increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]

Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more. Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in 68.39(a) through (e) on the offsite consequence analyses.

Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (10) for each accidental release. Compile written process safety information, which includes information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process, before conducting any process hazard analysis required by 40 CFR 68. [40 CFR 68.65(a)]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Document that equipment complies with recognized and generally accepted good engineering practices. [40 CFR 68.65(d)(2)] Determine that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner. [40 CFR 68.65(d)(3)]

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- 180 [40 CFR 68.67.a] Determine the priority order for conducting process hazard analyses based on a rationale which includes such considerations as extent of the process hazards, number of potentially affected employees, age of the process, and operating history of the process. [40 CFR 68.67(a)]
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Document the priority order for conducting process hazard analyses based on a rationale which includes such considerations as extent of the process hazards, number of potentially affected employees, age of the process, and operating history of the process. [40 CFR 68.67(a)]
- Use one or more of the methodologies in Sec. 68.67(b)(1) through (b)(7) to determine and evaluate the hazards of the process being analyzed; [40 CFR 68.67(b)]
- Use a team with expertise in engineering and process operations to perform the process hazard analysis. Include at least one employee who has experience and knowledge specific to the process being evaluated, and at least one employee who is knowledgeable in the specific process hazard analysis methodology being used. [40 CFR 68.67(d)]
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Document the resolution of the recommendations of the team performing the process hazard analysis, and what actions are to be taken. [40 CFR 68.67(e)]
- Establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions. [40 CFR 68.67(e)]
- Update and revalidate the process hazard analysis at least every five years after the completion of the initial process hazard analysis, to assure that the process hazard analysis is consistent with the current process. Use a team that meets the requirements in Sec. 68.67(d). [40 CFR 68.67(f)]
- Retain process hazards analyses and updates or validations for each process covered by this section, as well as the documented resolution of recommendations described in Sec. 68.67(e), for the life of the process. [40 CFR 68.67(g)]
- Perform an initial process hazard analysis (hazard evaluation) on processes covered by 40 CFR 68 as soon as possible, but not later than June 1, 1999. The process hazard analysis shall identify, evaluate, and control the hazards involved in the process, and address the information in 40 CFR 68.67(c)(1) through (7).
- Develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information. Address steps for each operating phase, operating limits, safety and health considerations, and safety systems and their functions in the procedures. [40 CFR 68.69(a)]
- Make operating procedures readily accessible to employees who work in or maintain a process. [40 CFR 68.69(b)]
- Review operating procedures as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources. Certify annually that these operating procedures are current and accurate. [40 CFR 68.69(c)]
- Develop and implement safe work practices to provide for the control of hazards during specific operations. [40 CFR 68.69(d)]
- Train each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process, in an overview of the process and in the operating procedures as specified in Sec. 68.69. Emphasize the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks. [40 CFR 68.71(a)(1)]

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- 194 [40 CFR 68.71.b] Provide refresher training at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. [40 CFR 68.71(b)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Prepare a record which contains the identity of the employee, the date of training required by 40 CFR 68.71, and the means used to verify that the employee understood the training. [40 CFR 68.71(c)]
- 195 [40 CFR 68.71.c] Ascertain that each employee involved in operating a process has received and understood the training required by Sec. 68.71. [40 CFR 68.71(c)]
- 196 [40 CFR 68.71.c] Establish and implement written procedures to maintain the ongoing integrity of process equipment listed in Sec. 68.73(a). [40 CFR 68.73(b)] Train each employee involved in maintaining the ongoing integrity of process equipment in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner. [40 CFR 68.73(c)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Document each inspection and test that has been performed on process equipment. Maintain records of the information specified in Sec. 68.73(d)(4). [40 CFR 68.73(d)(4)]
- 197 [40 CFR 68.73.b] Perform inspections and tests following recognized and generally accepted good engineering practices on process equipment listed in 40 CFR 68.73(a). Make the frequency of inspections and tests consistent with applicable manufacturer's recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience. [40 CFR 68.73(d)]
- 198 [40 CFR 68.73.c] Correct deficiencies in equipment that are outside acceptable limits before further use or in a safe and timely manner when necessary means are taken to assure safe operation. [40 CFR 68.73(e)]
- 199 [40 CFR 68.73.d.4] Assure that equipment as it is fabricated is suitable for the process application for which it will be used, in the construction of new plants and equipment. Perform appropriate checks and inspections to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions. Assure that maintenance materials, spare parts and equipment are suitable for the process application for which they will be used. [40 CFR 68.73(f)]
- 200 [40 CFR 68.73.d] Inform employees involved in operating a process, and maintenance and contract employees whose job tasks will be affected by a change in the process, and train them in the change, prior to start-up of the process or affected part of the process. [40 CFR 68.75(c)]
- 201 [40 CFR 68.73.e] Update the process safety information required by Sec. 68.65 if a change covered by 68.75 results in a change in the process safety information. [40 CFR 68.75(d)]
- 202 [40 CFR 68.73.f] Update the operating procedures or practices required by Sec. 68.69 if a change covered by 68.75 results in a change in the operating procedures or practices. [40 CFR 68.75(e)]
- 203 [40 CFR 68.75.c] Establish and implement written procedures to manage changes to process chemicals, technology, equipment, and procedures; and, changes to stationary sources that affect a covered process. Assure that the considerations specified in Sec. 68.75(b)(1) through (b)(5) are addressed prior to any change.
- 204 [40 CFR 68.75.d] Perform a pre-startup safety review for new stationary sources and for modified stationary sources when the modification is significant enough to require a change in the process safety information. Safety review must confirm the information specified in Sec. 68.77(b)(1) through (b)(4) prior to the introduction of regulated substances to a process.
- 205 [40 CFR 68.75.e] Develop a report of the findings of the compliance audit required by 40 CFR 68.79(a). [40 CFR 68.79(c)]
- 206 [40 CFR 68.75.f] Page 20 of 26
- 207 [40 CFR 68.77] TPOR0147
- 208 [40 CFR 68.79.c]

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- 209 [40 CFR 68.79.d] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Document the appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected. [40 CFR 68.79(d)]
- 210 [40 CFR 68.79.d] Determine an appropriate response to each of the findings of the compliance audit. [40 CFR 68.79(d)]
- 211 [40 CFR 68.79.e] Retain the two (2) most recent compliance audit reports. [40 CFR 68.79(e)]
- 212 [40 CFR 68.79] Conduct compliance audit: Due at least every three years. Certify compliance with the provisions of the prevention program to verify that procedures and practices developed under 40 CFR 68 are adequate and are being followed. Conduct compliance audit by at least one person knowledgeable in the process.
- 213 [40 CFR 68.81.c] Establish an incident investigation team consisting of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident. [40 CFR 68.81(c)]
- 214 [40 CFR 68.81.e] Establish a system to promptly address and resolve the incident report findings and recommendations. [40 CFR 68.81(e)]
- 215 [40 CFR 68.81.e] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Document resolutions and corrective actions of the incident report findings and recommendations. [40 CFR 68.81(e)]
- 216 [40 CFR 68.81] Prepare a report at the conclusion of the incident investigation which includes, at a minimum, the information specified in 40 CFR 68.81(d)(1) through (5). Review the report with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable. Retain the incident investigation reports for five years.
- 217 [40 CFR 68.81] Conduct incident investigation. Initiate as promptly as possible, but not later than 48 hours following each incident which resulted in, or could reasonably have resulted in a catastrophic release of a regulated substance.
- 218 [40 CFR 68.83.a] Develop a written plan of action regarding the implementation of the employee participation required by 40 CFR 68. [40 CFR 68.83(a)]
- 219 [40 CFR 68.83.b] Consult with employees and their representatives on the conduct and development of process hazards analyses and on the development of the other elements of process safety management. [40 CFR 68.83(b)]
- 220 [40 CFR 68.83.c] Provide to employees and their representatives access to process hazard analyses and to all other information required to be developed under 40 CFR 68. [40 CFR 68.83(c)]
- 221 [40 CFR 68.85] Issue a hot work permit for hot work operations conducted on or near a covered process. Document in the permit that the fire prevention and protection requirements in 29 CFR 1910.252(a) have been implemented prior to beginning the hot work operations; indicate the date(s) authorized for hot work, and identify the object on which hot work is to be performed. Keep permit on file until completion of the hot work operations.
- 222 [40 CFR 68.87.b.1] Obtain and evaluate information regarding the contract owner or operator's safety performance and programs, when selecting a contractor. [40 CFR 68.87(b)(1)]
- 223 [40 CFR 68.87.b.2] Inform contract owner or operator of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process. [40 CFR 68.87(b)(2)]
- 224 [40 CFR 68.87.b.3] Explain to the contract owner or operator the applicable provisions of 40 CFR 68 Subpart E. [40 CFR 68.87(b)(3)]
- 225 [40 CFR 68.87.b.4] Develop and implement safe work practices consistent with Sec. 68.69(d) to control the entrance, presence, and exit of the contract owner or operator and contract employees in covered process areas. [40 CFR 68.87(b)(4)]

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- 226 [40 CFR 68.87.b.5] Periodically evaluate the performance of the contract owner or operator in fulfilling their obligations as specified in 40 CFR 68.87(c). [40 CFR 68.87(b)(5)]
- 227 [40 CFR 68.95.a] Develop and implement an emergency response program for the purpose of protecting public health and the environment. Include in the program the elements listed in 40 CFR 68.95(a)(1) through (4). [40 CFR 68.95(a)]
- 228 [40 CFR 68.95.c] Coordinate the emergency response plan developed under 68.95(a)(1) with the community emergency response plan developed under 42 U.S.C. 11003. Upon request of the local emergency planning committee or emergency response officials, promptly provide information necessary for developing and implementing the community emergency response plan. [40 CFR 68.95(c)]
- 229 [40 CFR 82 Subpart F] Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B.
- 230 [LAC 33:III.1.103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited (State Only).
- 231 [LAC 33:III.1.109.B] Outdoor burning of waste material or other combustible material is prohibited.
- 232 [LAC 33:III.1.103.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited (State Only).
- 233 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes
- 234 [LAC 33:III.2.113.A] Which Months: All Year Statistical Basis: Six-minute average
- 235 [LAC 33:III.2.19] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 236 [LAC 33:III.2901.D] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 237 [LAC 33:III.2901.F] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 238 [LAC 33:III.501.C.1] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 239 [LAC 33:III.501.C.6] Submit permit application: Due prior to construction, reconstruction or modification unless otherwise provided in LAC 33:III. Chapter 5. Submit a timely and complete permit application to the Office of Environmental Services as required in accordance with the procedures in LAC 33:III. Chapter 5.
- Any daily average VCM residue in PVC slurry above 175 ppm or an average VCM residue above 35 ppm for any ninety (90) consecutive day period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division. Vinyl chloride recordkeeping by the regulation's specified method(s) daily.

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240 [LAC 33:III.501.C.6]	Maintain, to the extent practicable, a leak-free facility taking such steps as are necessary and reasonable to prevent leaks and to expeditiously repair leaks that occur. Update the written plan presently required by LAC 33:III.211.3.A.4 within 30 days of receipt of this permit to incorporate these general duty obligations into the housekeeping procedures. The plan shall then be considered a means of emission control subject to the required use and maintenance provisions of LAC 33:III.905. Failure to develop, use, and diligently maintain the plan shall be a violation of this permit. (State Only)
241 [LAC 33:III.501.C.6]	Applicability of each specific requirement in this permit shall be determined in accordance with the most current regulation(s) referenced in each specific requirement.
242 [LAC 33:III.501.C.6]	Vinyl chloride recordkeeping by electronic or hard copy daily. The weighted average residual of VCM in all grades of resin processed through the stripper shall be calculated for each calendar day and recorded daily. In addition, the average VCM residue for the last ninety (90) calendar days shall be calculated and recorded daily. These records shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.
243 [LAC 33:III.501.C.6]	Maintain best practical housekeeping and maintenance practices at the highest possible standards to control emissions of highly reactive volatile organic compounds (HR VOC), which include 1,3-Butadiene, Butene, cis-2-Buylene, trans-2-Buylene, Ethylene, Propylene, Toluene, Xylene, m/p-Xylene, o-Xylene. (State Only)
244 [LAC 33:III.504]	Comply with the requirements of the Nonattainment New Source Review Program. This permit includes provisions of the Nonattainment New Source Review Procedures (NNSR) from LAC 33:III.504.
245 [LAC 33:III.507.A.1.a]	Any major source as defined in LAC 33:III.502 is designated a Part 70 source and is required to obtain a permit which will meet the requirements of LAC 33:III.507.
246 [LAC 33:III.509.I.1]	No major stationary source or major modification to which the requirements of this Part apply shall begin actual construction without a permit issued under this Section.
247 [LAC 33:III.509.I.]	A major stationary source or major modification shall meet each applicable emissions limitation under the Louisiana State Implementation Plan and each applicable emissions standard and standard of performance under the Louisiana New Source Performance Standards (LNPS) and Louisiana Emission Standards for Hazardous Air Pollutants (LESHAP) and Sections 111 and 112 of the Clean Air Act.
248 [LAC 33:III.509.I.]	A major modification shall apply best available control technology for each pollutant subject to regulation under this Section which would result in a significant net emissions increase at the source. This requirement applies to each proposed emissions unit at which a net emissions increase in the pollutant would occur as a result of a physical change or change in the method of operation in the unit.
249 [LAC 33:III.509]	Comply with the requirements of PSD-LA-546 (M-2). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-546 (M-2).
250 [LAC 33:III.5105.A.1]	Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III. Chapter 51. Subchapter A without first obtaining a written authorization from DEQ in accordance with LAC 33:III. Chapter 51. Subchapter A, after the effective date of the standard.
251 [LAC 33:III.5105.A.2]	Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109.B.
252 [LAC 33:III.5105.A.3]	Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
253 [LAC 33:III.5105.A.4]	Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A.

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- 254 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
- Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- Submit Annual Emissions Report (TEID): Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112; Table 51-1; or a reportable quantity (RQ) in LAC 33:III.3931; or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923.
- Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931.
- Submit written report: Due to certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
- Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity. IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
- Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.

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- 264 [LAC 33:III.5113.A.2]
- 265 [LAC 33:III.511]
- 266 [LAC 33:III.5151.F.1.f]
- 267 [LAC 33:III.517.A.1]
- 268 [LAC 33:III.517.B.1]
- 269 [LAC 33:III.517.D]
- 270 [LAC 33:III.517.E]
- 271 [LAC 33:III.523.A]
- 272 [LAC 33:III.523.B.2]
- 273 [LAC 33:III.523.B.3]
- 274 [LAC 33:III.5609.A.1.b]
- 275 [LAC 33:III.5609.A.2.b]
- 276 [LAC 33:III.5609.A.3.b]
- 277 [LAC 33:III.5609.A]
- 278 [LAC 33:III.5901.A]
- 279 [LAC 33:III.5901]

Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.

Submit notification: Due to the permitting authority prior to the initiation of any project which will result in emission reductions. Include in the notification a description of the proposed action, a location map, a description of the composition of air contaminants involved, the rate and temperature of the emissions, the identity of the sources involved and the change in emissions. Make any appropriate permit revision reflecting the emission reduction no later than 180 days after commencement of operation and in accordance with the procedures of LAC 33:III.Chapter 5. An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.

Submit permit application: Due prior to commencement of construction, reconstruction, or modification of the source, for new or modified sources. Do not commence construction, reconstruction, or modification of any source required to be permitted under LAC 33:III.Chapter 5 prior to approval by the permitting authority.

Any application form, report, or compliance certification submitted under this Chapter shall contain certification by a responsible official of truth, accuracy, and completeness. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the application are true, accurate, and complete.

Submit applications for permits in accordance with forms and guidance provided by the DEQ. At a minimum, each permit application submitted under LAC 33:III.Chapter 5 shall contain the information specified in LAC 33:III.517.D, subparagraphs 1-18.

In addition to those elements listed under LAC 33:III.517.D, include in each application pertaining to a Part 70 source the information specified in LAC 33:III.517.E. Subparagraphs 1-8.

Submit permit modification application: Due within 45 days of obtaining relevant test results. The permit modification or amendment shall include all information necessary to process the request, and is required if testing demonstrates that the terms and conditions of the existing permit are inappropriate or inaccurate.

Submit application for temporary exemption for testing: Due prior to test initiation. Submit the information specified in LAC 33:III.517 (with the exception of the data being measured in the test). Conduct testing for the minimum duration consistent with obtaining valid results.

Submit test results: Due within 30 days of test completion to the administrative authority. The report details the conditions that were found to exist during a temporary exemption for testing. State if there is to be no permanent change in emissions from pretest conditions.

Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Alert.

Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning.

Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency.

Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.

Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611. Tables 5, 6, and 7.

Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.

All affected facilities shall comply with all applicable provisions in LAC 33:III.5901.

SPECIFIC REQUIREMENTS

AI ID: 288 - Formosa Plastics Corp Louisiana - Baton Rouge Plant

Activity Number: PER20060005

Permit Number: 1004-V1

Air - Title V Regular Permit Major Mod

UNF_0003 UNF3 - PVC Unit

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Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.

Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.

Submit Emission Inventory (EI) Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.